



ATCO Pipelines (AP)

Yellowhead Pipeline

Facility Application

Table of Contents

INDEX TO INFORMATION REQUIRED PER AUC RULE 007	5
INDEX TO INFORMATION REQUIRED PER AUC RULE 007	6
GLOSSARY OF ABBREVIATIONS	7
GLOSSARY OF PIPELINES	9
EXECUTIVE SUMMARY	11
SECTION 1: INTRODUCTION	13
1.1 BACKGROUND AND NEED FOR THE YP PROJECT	13
SECTION 2: YP PROJECT SCOPE, SCHEDULE, AND COST	14
2.1 OVERVIEW	14
2.2 YP PROJECT SCOPE AND AUC APPROVALS REQUESTED	14
2.3 SCHEDULE	15
2.4 YP PROJECT COST	16
SECTION 3: ROUTE SELECTION	16
3.1 OVERVIEW	16
3.2 STAGE 1 – DETERMINE SYSTEM REQUIREMENTS AND IDENTIFY STUDY AREA	19
3.3 STAGE 2 – GENERATE ROUTE OPTIONS	21
3.4 STAGE 3 – EVALUATE ROUTE OPTIONS AND SELECT PRELIMINARY PREFERRED ROUTE	22
3.3.1 Western Route Area	24
3.3.1.1 West 1 (orange) (NE-27-54-14-W5 to SE-14-54-3-W5)	24
3.3.1.2 West 2 (green) (NE-27-54-14-W5 to SE-14-54-3-W5)	25
3.3.2 Central Route Area	25
3.3.2.1 Central 1 (purple) (SE-14-54-3-W5 to SW-33-54-24-W4)	25
3.3.2.2 Central 2 (white) (SE-14-53-6-W5 to SW-33-54-24-W4)	25
3.3.3 East Route Area	25
3.3.3.1 East 1 (red) (SW-33-54-24-W4 to SE-15-55-21-W4)	26
3.3.3.2 East 2 (yellow) (NW-35-54-24-W4 to SE-35-54-22-W4)	26
3.3.3.3 East 3 (blue) (SW-33-54-24-W4 to SE-21-53-23-W4)	26
3.3.4 Analysis of Preliminary Route Options	26
3.3.4.1 Comparison of Western Segments	29
3.3.4.2 Comparison of Central Segments	30
3.3.4.3 Comparison of Eastern Segments	30
3.3.4.4 Discussion	31
3.3.4.5 Further analysis of eastern tie-in locations	32
3.3.4.6 East segment constraints analysis	32
3.5 STAGE 4 - ASSESSMENT OF PRELIMINARY PREFERRED ROUTE	34
3.6 STAGE 5 - REFINEMENT AND CONFIRMATION OF THE PREFERRED ROUTE	35
3.7 FACILITY LOCATIONS	35
3.6.1 YP West Interconnect	36
3.6.2 YP East Control Station	36
3.6.3 YP Compressor Station	36
SECTION 4: PARTICIPANT INVOLVEMENT PROGRAM (PIP)	38
4.1 OVERVIEW	38
4.2 STAGE 1 – EARLY ENGAGEMENT ON SEVEN POTENTIAL ROUTE SEGMENTS	41
4.2.1 Notification and Consultation	42

4.2.2	Open Houses	45
4.2.3	Findings from Early Engagement on the Seven Route Segments	48
4.2.3.1	Western Route Segments.....	48
4.2.3.2	Central Route Segments.....	49
4.2.3.3	Eastern Route Segments.....	49
4.3	STAGE 2 - ENGAGEMENT ON THE PRELIMINARY PREFERRED ROUTE	50
4.3.1	Notification and Consultation.....	50
4.3.2	Open Houses	51
4.4	STAGE 3 - ONGOING RESOLUTION OF CONCERNS	54
4.5	SUMMARY OF PARTICIPANT INVOLVEMENT PROGRAM	55
4.5.1	Provincial Governmental Agencies.....	55
4.5.2	Local and Municipal Authorities.....	55
4.5.3	Federal Governmental Agencies.....	56
4.5.4	Private Landholders	56
4.5.5	Industry	57
4.6	PARTICIPANT INVOLVEMENT PROGRAM FOR INDIGENOUS GROUPS	57
4.6.1	Early Engagement on the Seven Potential Route Segments	59
4.6.2	Engagement on Preliminary Preferred Route.....	61
4.6.3	Ongoing Consultation.....	63
4.6.4	Summary of Indigenous Groups Consulted.....	63
4.6.5	Benefits to Indigenous Groups	65
4.7	CONCLUSION ON PIP	66
SECTION 5:	ENVIRONMENTAL CONSIDERATIONS AND OTHER APPLICABLE REGULATIONS	67
5.1	OVERVIEW	67
5.2	ENVIRONMENTAL IMPACT	67
5.3	HISTORICAL RESOURCES	75
5.3.1	Paleontological sites.....	76
5.3.2	Traditional Use Sites of a Historical Resource Nature.....	76
5.4	SURFACE DISTURBANCES IN TRANSPORTATION UTILITY CORRIDOR	76
5.5	OTHER AGENCY APPROVALS	76
5.5.1	Municipal Approvals	77
5.6	OTHER ACTS AND APPROVALS.....	77
5.7	AGRICULTURAL OPERATIONS.....	80
SECTION 6:	TECHNICAL CONSIDERATIONS	81
6.1	OVERVIEW	81
6.2	EXISTING APPROVALS FOR FACILITIES DIRECTLY AFFECTED BY YP PROJECT	81
6.2.1	AP Facilities	81
6.2.2	NGTL Pipeline System	81
6.3	NOx EMISSIONS	81
6.4	AUDIBLE NOISE LEVELS	82
6.4.1	YP East Control Station.....	83
6.4.2	YP Compressor Station.....	84
6.5	HYDROGEN SULPHIDE SPECIFICATIONS.....	84
6.6	COMPLIANCE WITH CSA Z662 AND ASME B31.3, AND SUPPORTING DIAGRAMS.....	85
6.6.1	YP Project	85
6.6.2	YP Compressor Station.....	85
6.7	EMERGENCY RESPONSE PLAN.....	86
6.8	COMPLIANCE WITH PROCEDURES FOR CORROSION MITIGATION, MONITORING, EVALUATION, AND RECORD KEEPING.....	86
6.9	FLARING, INCINERATING, AND VENTING.....	86
6.10	STORAGE REQUIREMENTS.....	86
SECTION 7:	CONCLUSION	86
LIST OF APPENDICES AND ATTACHMENTS	88	

Appendix A – Facility & Technical Diagrams

Attachment A1 – Right-of-Way Plan

Attachment A2 – Geospatial Data of Pipeline Segments

Appendix B – Participant Involvement Program Materials

Attachment B1 – Yellowhead Pipeline Project Information from ATCO's Website

Attachment B2 – Sample Participant Involvement Program Information Package

Attachment B3 – Example of Open House Door Hanger

Attachment B4 A – Example of Digital Marketing for Preliminary Route Open Houses

Attachment B4 B – Example of Digital Marketing for Preliminary Preferred Route Open Houses

Attachment B5 – Open House Materials

Attachment B6 A – Complete Line List of all Tracts

Attachment B6 B – Directly Affected Stakeholders Requiring Confirmation of Non-Objection

Attachment B6 C – Personal Consultation within 100m of Directly Adjacent Stakeholders

Attachment B6 D – 200m Notification Stakeholders

Attachment B6 E – Compressor Notification Line List

Attachment B7 A – Aboriginal Consultation Documents

Attachment B7 B – Consultation Mitigation Table

Attachment B7 C – Consultation Overview all Communities

Attachment B8 – Example of Confirmation of Non-Objection Documentation

Attachment B9 A – Listing of Objections and Concerns – Directly Affected Stakeholders

Attachment B9 B – Listing of Concerns – Adjacent Stakeholders

Appendix C – Environmental Evaluation

Appendix D – Environmental Protection Plan

Attachment D1 – Environmental Protection Plan – Mainline

Attachment D2 – Environmental Protection Plan – Facilities

Appendix E – Noise Impact Assessment Reports

Attachment E1 – YP East Control Station Noise Impact Assessment Report

Attachment E2 – YP Compressor Station Noise Impact Assessment Report

Appendix F – Technical Diagrams

Attachment F1 & F2 – Process Flow Diagrams

Attachment F3 – Plot Plan

Appendix G – Rule 007 Gas Utility Pipeline Licence Application Form

The indices presented below are designed to facilitate the identification of all requirements outlined in AUC Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments, and Gas Utility Pipelines* (Rule 007) that are applicable to gas utility pipeline facility applications. These indices reference the current version of Rule 007 that is effective until November 5, 2025. In anticipation of the regulatory changes announced in Bulletin 2025-14, AP has also provided references to the requirements under the updated Rule 007, which becomes effective on November 6, 2025. To clarify, AP is submitting this Application under the current version of Rule 007, and understands that the evaluation of the Application will be based on this current version of Rule 007.

**INDEX TO INFORMATION REQUIRED PER AUC RULE 007
(Effective March 28, 2024, to November 5, 2025)**

Information Requirements (short description)		Reference
Project Description		
GU12	Licence Requested	Section 2.2
GU13	Description of Project	Section 1.1
GU14	Existing Approvals for Facilities Impacted by Project	Section 6.2
GU15	Need for the Project	Section 1.1
GU16	Capital Forecast Variance of +/- 30%	Section 2.4
GU17	Pipeline Route and Right of Way	Section 3.5
GU18	H2S Content	Section 6.5
GU19	H2S Pressure	Section 6.5
GU20	Compliance with CSA Z662 Design Requirements	Section 6.6
GU21	Compliance with Table 5.3 of CSA Z662	Section 6.6
GU22	Compliance with Procedures for Corrosion Mitigation, Monitoring, Evaluation, and Record Keeping	Section 6.8
GU23	Line Heater Compliance with ASME B31.3	Section 6.6
GU24	Process Flow Diagram	Attachment F1-F2
GU25	Plot Plan	Attachment F3
Emergency Response Plan		
GU26	Emergency Response Plan	Section 6.7
Environmental Information		
GU27	Environmental Evaluation Report	Appendix C
GU28	Federal Lands Environmental Impact Analysis	Section 5.2
GU29	Environmental Protection Plan	Appendix D
Nitrogen Oxides Emissions		
GU30	NOx Emissions	Section 6.3
Noise		
GU31	Noise Impact Assessment	Section 6.4
Approvals, Reports and Assessments from other Agencies		
GU32	Compliance with Other Acts	Section 5.6
GU33	Surface Disturbance in the Transportation Corridor	Section 5.4
GU34	Historical Resources Act Approval	Section 5.3
Participant Involvement Program		
GU35	Consultation and Notification Radius	Section 4
GU36	Distance to Nearest Residence	Section 4.1
GU37	Distance to Nearest Surface Development (Pipeline Installations)	Section 4.1
GU38	Participation Involvement Information	Section 4
GU39	Contact Information	Section 4.7
GU40	Consultation with Local Jurisdictions	Section 4.2 and 4.5
GU41	Crown Disposition Holders Notification	Section 4.3
GU42	Concerns and Remediations	Attachment B9

**INDEX TO INFORMATION REQUIRED PER AUC RULE 007
(Effective November 6, 2025)**

Information Requirements (short description)		Reference
Project Description		
GU12	Licence Requested	Section 2.2
GU13	Description of Project	Section 1.1
GU14	Existing Approvals for Facilities Impacted by Project	Section 6.2
GU15	Need for the Project	Section 1.1
GU16	Capital Forecast Variance of +/- 30%	Section 2.4
GU17	Pipeline Route and Right of Way	Section 3.5
GU18	H2S Content	Section 6.5
GU19	H2S Pressure	Section 6.5
GU20	Compliance with CSA Z662 Design Requirements (inc. Table 5.3)	Section 6.6
GU21	Compliance with Procedures for Corrosion Mitigation, Monitoring, Evaluation, and Record Keeping	Section 6.8
GU22	Line Heater Compliance with ASME B31.3	Section 6.6
GU23	Process Flow Diagram	Attachment F1-F2
GU24	Plot Plan	Attachment F3
Emergency Response Plan		
GU25	Emergency Response Plan	Section 6.7
Environmental Information		
GU26	Environmental Evaluation Report	Appendix C
GU27	Federal Lands Environmental Impact Analysis	Section 5.2
GU28	Environmental Protection Plan	Appendix D
Nitrogen Oxides Emissions		
GU29	NOx Emissions	Section 6.3
Noise		
GU30	Noise Impact Assessment	Section 6.4
GU31	Construction Noise Compliance	Section 6.4
Approvals, Reports and Assessments from other Agencies		
GU32	Compliance with Other Acts	Section 5.6
GU33	Surface Disturbance in the Transportation Corridor	Section 5.4
GU34	Historical Resources Act Approval	Section 5.3
Participant Involvement Program		
GU35	Consultation and Notification Radius	Section 4
GU36	Distance to Nearest Residence & Surface Development	Section 4.1
GU37	Participation Involvement Information	Section 4
GU38	Contact Information	Section 4.7
GU39	Consultation with Local Jurisdictions	Section 4.2 and 4.5
GU40	Crown Disposition Holders Notification	Section 4.3
GU41	Concerns and Remediations	Attachment B9
Operational and Storage Requirements		
GU42	Confirmation of Compliance with Operational and Storage Requirements	Section 6.9 and Section 6.10

GLOSSARY OF ABBREVIATIONS

ABSA	Alberta Boilers Safety Association
ACIMS	Alberta Conservation Information Management System
ACO	Aboriginal Consultation Office
ACSW	Alberta Arts, Culture and Status of Women
AEP	Alberta Environment and Parks
AEPA	Alberta Environment and Protected Areas
AER	Alberta Energy Regulator
AP	ATCO Pipelines
ASB	Agricultural Services Board
ASCC	Alberta Safety Codes Council
ASL	Ambient Sound Level
ASME	American Society of Mechanical Engineers
AUC	Alberta Utilities Commission
CER	Canada Energy Regulator
CNWA	<i>Canadian Navigable Waters Act</i>
CPVRR	Cumulative Present Value of Revenue Requirements
CSA	Canadian Standards Association
CWIP	Construction Work in Progress
dBA	A-weighted decibels
DFO	Department of Fisheries and Oceans
DUC	Ducks Unlimited Canada
ECCC	Environment and Climate Change Canada
EE	Environmental Evaluation
EPEA	<i>Environmental Protection and Enhancement Act</i>
EPP	Environmental Protection Plan
ERA	Early Resolution and Access Payments
ERP	Emergency Response Plan
ESA	Environmentally Significant Area
FEED	Front End Engineering Design
FMA	Forest Management Agreement
FWMIS	Fisheries and Wildlife Management Information System
GIS	Geographic Information System
GRA	General Rate Application
GUA	<i>Gas Utilities Act</i>
Ha	Hectare
HRA	<i>Historical Resources Act</i>
HRIA	Historical Resources Impact Assessment
HRV	Historical Resource Value
IBA	Important Bird Areas
ISD	In-Service Date
km	kilometer, a unit of distance
KWBZ	Key Wildlife Biodiversity Zone
LAIRT	Landscape Analysis Indigenous Relations Tool

m	Metre
MBR	Migratory Birds Regulation
MDP	Municipal Development Plan
MGA	<i>Municipal Government Act</i>
MSSC	Master Schedule of Standards and Conditions
MW	Megawatt
NGTL	NGTL GP Ltd., as general partner on behalf of NGTL Limited Partnership (collectively NGTL)
NIA	Noise Impact Assessment
NPS	Nominal Pipe Size
O&M	Operations and Maintenance
PIP	Participant Involvement Program
PLA	<i>Public Lands Act</i>
PLSR	Public Land Standing Reports
PPS	Proposal to Provide Service
PSL	Permissible Sound Level
RTF	Regulator Temporary Field Authorization
RoW	Right-of-Way
SARA	<i>Species at Risk Act</i>
SCA	<i>Safety Code Act</i>
SME	Subject Matter Expert
SMP	Stormwater Management Plan
SPIN2	Alberta Land Titles Spatial Information System
TEC	Alberta Transportation and Economic Corridors
TMX	Trans Mountain Expansion Pipeline
TUC	Transportation Utility Corridor
VC	Valued Components
WSP	WSP Canada Inc.
YP	Yellowhead Pipeline

GLOSSARY OF PIPELINES

AP Inland Transmission System

The part of the AP high-pressure gas utility pipeline system located east of Edmonton, that originates from the Inland and Norma interconnects to the NGTL System north of the town of Viking, and includes the Inland transmission pipeline and loops, the Norma transmission pipeline and loops, Cloverbar and Salt Cavern Transmission Pipeline, and other various pipelines in this region east of Edmonton, that have historically been used to supply natural gas to the Greater Edmonton Area.

AP Salt Cavern Transmission Pipeline

A 610 mm / 762 mm (24 inch / 30 inch) high-pressure gas utility pipeline operated by AP and regulated by the Alberta Utilities Commission (AUC) from 33-54-21-W4M, East of the Hamlet of Josephburg, to 34-55-21-W4M, in the Alberta Industrial Heartland area, that has been historically used by AP to inject and withdraw natural gas from the AP Salt Cavern Storage Facility and to deliver gas to industrial customers in the region.

NGTL January Creek Pipeline

A high-pressure gas transmission pipeline operated by NGTL and regulated by the Canada Energy Regulator (CER).

Pembina Pipeline

Refers to the Pembina Pipeline Corporation that owns and operates pipelines in Western Canada for the transportation of hydrocarbon liquids and natural gas.

Trans Mountain Expansion Pipeline (TMX)

A major infrastructure initiative to increase the capacity of the existing Trans Mountain Pipeline system, which transports crude oil and refined petroleum products from Edmonton, Alberta to Burnaby, British Columbia. TMX became operational in May 2024.

Wabamun-Hinton Transmission Pipeline

A 273 mm (10 inch) high-pressure gas utility pipeline operated by AP and regulated by the AUC from 24-51-25-W5M, near the Town of Hinton, to 24-53-04-W5M, North of Wabamun Lake. This natural gas pipeline was originally constructed to transport and gather gas from the Hinton area through to the Wabamun area and towards the Greater Edmonton Area.

Wabamun-Onoway Transmission Pipeline

A 273mm (10 inch) high-pressure gas utility pipeline operated by AP and regulated by the AUC from 24-53-04-W5M, North of Wabamun Lake, to 35-54-02-W5M, near the Town of Onoway. This natural gas pipeline was constructed to transport gas from the Wabamun area to the Onoway area and towards the Greater Edmonton Area.

Yellowhead Pipeline

The proposed 914 mm (36 inch) high-pressure gas utility transmission pipeline project, to be owned and operated by AP and regulated by the AUC, which is necessary to address increased natural gas demand on the Integrated Alberta System and is the subject of this Application.

EXECUTIVE SUMMARY

ATCO Pipelines (AP), a division of ATCO Gas and Pipelines Ltd., respectfully requests the Alberta Utilities Commission's (AUC or Commission) timely approval to construct and operate the Yellowhead Pipeline (YP) Project, a gas utility pipeline as defined in the *Gas Utilities Act* (GUA) and AUC Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines* (Rule 007). The YP Project is required to provide increased system capacity to meet the additional contract and forecast demand for natural gas transportation service on the Integrated Alberta System. The need for the YP Project was approved by the AUC in Decision 29318-D01-2025.

The YP Project will consist of:

- 235 km of new 914 mm (NPS 36) transmission pipeline, between the NGTL January Creek Pipeline and the AP Salt Cavern Transmission Pipeline, designated as the YP Mainline, including:
 - A new pipeline connection with NGTL's January Creek Pipeline designated as the YP West Interconnect;
 - A new control station designated as YP East Control Station, connecting the YP Mainline to the AP Salt Cavern Transmission Pipeline;
 - Several block valve assemblies; and
- A new compressor station designated as the YP Compressor Station.

The applied-for route (the Preferred Route) will run from the YP West Interconnect near Peers, Alberta, east to the YP East Control Station near the City of Fort Saskatchewan, where it will connect with the AP Salt Cavern Transmission Pipeline, which forms part of the AP Inland Transmission System. The Preferred Route was informed by various technical and economic considerations, as well as input from stakeholders through early engagement efforts and AP's Participant Involvement Program (PIP). AP submits that the Preferred Route and proposed facilities locations will best meet the need of the Integrated Alberta System while considering significant input from stakeholders. With this

Application, AP is requesting the Commission's approval pursuant to its authority under the GUA and the *Pipeline Act*, to proceed with the construction and operation of the YP Project.

The timelines for the YP Project are summarized in Table 1 below:

Table 1: Timelines

Activity or Milestone	Start Date	Target Completion Date
Consultation	Q2 2024	Ongoing
Land Rights Acquisition	Q2 2025	Q2 2026
Procurement and Detailed Engineering	Q3 2025	Q2 2026
Facility Application	Q4 2025	Q2 2026
Construction	Q3 2026	Q4 2027
Commissioning	Q3 2027	Q4 2027

In order for AP to maintain construction and commissioning timelines, AP has proposed the following process schedule for consideration by the Commission:

Table 2: Proposed Process Schedule

Activity	Start Date
File Application	Nov 4, 2025
AUC Filing Announcement	Nov 5, 2025
Notice of Application-Request for Statements of Intent to Participate	Nov 14, 2025
Statements of Intent to Participate	Dec 8, 2025
AP response on Statements of Intent to Participate	Dec 18, 2025
Commission ruling on standing	Jan 9, 2026
IRs to AP from AUC and Interveners	Jan 23, 2026
AP responses to IRs	Feb 6, 2026
Intervener evidence	Feb 20, 2026
IRs to Interveners	Mar 6, 2026
Responses from Interveners	Mar 20, 2026
Rebuttal Evidence from AP	Apr 2, 2026
Hearing Commencement (if needed)	Apr 20, 2026
Decision	Within 90 days of close of record

SECTION 1: INTRODUCTION

1.1 Background and Need for the YP Project

1. Through the YP Project, AP proposes to construct and operate new gas utility pipeline facilities in west-central Alberta, in order to expand the capacity of the Integrated Alberta System.¹ The YP Project includes the construction of approximately 235 kilometers (km) of new 914 mm (NPS 36) transmission pipeline in a new right-of-way (YP Mainline) from a new interconnect station tying into NGTL's January Creek Pipeline near Peers, Alberta (YP West Interconnect) to a new control station tying into AP's Salt Cavern Transmission Pipeline near the City of Fort Saskatchewan (YP East Control Station). The YP Project also includes the construction of a new compressor station (YP Compressor Station). The YP Project is expected to be completed and operating in the fourth quarter of 2027. The YP Project will provide an efficient and direct path from NGTL's Peace River region natural gas supply to the Greater Edmonton Area, thereby increasing the capacity of the Integrated Alberta System to meet incremental contract and forecast demand.

2. In September 2024, AP submitted a Need Assessment Application to the AUC to establish the need for the YP Project (Need Application). On August 21, 2025, the Commission approved the Need Application in Decision 29318-D01-2025, noting that a separate application for approval to construct and operate the YP Project would be considered in a subsequent AUC proceeding. As discussed in the Need Application,² the YP Project is a transformative gas utility pipeline project that is necessary to address incremental contract and forecast natural gas demand on the Integrated Alberta System, which, if not addressed, would result in a delivery capacity shortfall. The YP Project will contribute to ensuring safe and reliable energy supply for Alberta's growing population and industrial base, connect natural gas production to key domestic markets, and contribute to economic growth through significant capital investment, jobs, and enabling investment in the industrial sector reliant on the Integrated Alberta System. Additional

¹ The Integrated Alberta system is the combined Alberta natural gas transmission system made up of assets owned and operated by each of AP and NGTL GP Ltd., as a general partner on behalf of NGTL Limited Partnership (NGTL) in accordance with the Alberta System Integration Agreement between ATCO Gas & Pipelines Ltd. and NGTL dated April 7, 2009, as amended (Integration Agreement)

² Proceeding 29318

details regarding the benefits of the YP Project were outlined in Section 9 and Attachment 6 in the Need Application.

SECTION 2: YP PROJECT SCOPE, SCHEDULE, AND COST

2.1 Overview

3. This Section describes the scope, schedule, and cost for the proposed facilities comprising the YP Project, including the facilities' location and engineering specifications. The facilities would be designed, constructed, and operated in accordance with the licence issued pursuant to this Application, if granted, and in accordance with the requirements of the GUA, *Pipeline Act*, *Safety Codes Act* (SCA), all applicable Canadian Standards Association (CSA) design requirements, and all other applicable legislation, regulatory requirements, and accepted industry standards.

2.2 YP Project Scope and AUC Approvals Requested

4. AP hereby applies to the AUC pursuant to Section 11 of the *Pipeline Act* and Section 4.1 of the GUA for approval to construct and operate the YP Project, a gas utility pipeline comprised of the following pipe and associated installations:

- A new 235 km 914 mm (NPS 36) transmission pipeline, originating from the NGTL January Creek Pipeline near Peers, Alberta and terminating at the AP Salt Cavern Transmission Pipeline near the City of Fort Saskatchewan, designated as the YP Mainline. This includes:
 - A new pipeline connection with NGTL's January Creek Pipeline designated as YP West Interconnect;
 - A new control station designated as YP East Control Station, connecting the YP Mainline to the AP Salt Cavern Transmission Pipeline; and
 - Several block valve assemblies.
- A new compressor station designated as the YP Compressor Station.

Table 3: Facility Land Locations

Licenced Facility		Land (Legal)	Latitude	Longitude
YP Mainline 235 km of 36" Pipeline	from January Creek	NE-27-54-14-W5M	53° 41' 51.26" N	115° 58' 23.44" W
	to AP Inland Transmission	SE-15-55-21-W4M	53° 44' 56.40" N	113° 01' 53.22" W
	YP West Interconnect	NE-27-54-14-W5M	53° 41' 51.26" N	115° 58' 23.44" W
	YP East Control Station	SE-15-55-21-W4M	53° 44' 56.40" N	113° 01' 53.22" W
	Block Valve 1	NE 26-53-12-W5M	53° 36' 26.84" N	115° 39' 7.30" W
	Block Valve 2	SE 28-53-9-W5M	53° 36' 7.34" N	115° 15' 18.55" W
	Block Valve 3	NE 18-53-6-W5M	53° 34' 50.44" N	114° 51' 46.13" W
	Block Valve 4	NW 27-53-4-W5M	53° 36' 26.70"N	114° 31' 0.74"W
	Block Valve 5	NW-4-54-3-W5M	53° 38' 9.6" N	114° 23' 38.4" W
	Block Valve 6	NW 21-54-2-W5M	53° 41' 10.14" N	114° 14' 30.68" W
	Block Valve 7	SE 16-55-1-W5M	53° 44' 43.11" N	114° 05' 15.92" W
	Block Valve 8	SE 1-55-26-W4M	53° 43' 1.2" N	113° 44' 34.8" W
	Block Valve 9	SW 15-55-23-W4M	53° 44' 44.06" N	113° 20' 21.73" W
YP Compressor Station		SW-34-53-13-W5M	53° 37' 03.03" N	115° 51' 01.74" W

2.3 Schedule

5. Contingent upon receipt of the necessary approvals, construction is scheduled to commence by Q3 of 2026, with the target in-service date (ISD) being Q4 2027.

6. The anticipated project schedule is provided in Table 4 below; however, the dates set out therein are approximate and may change depending on various factors, such as the timing of regulatory approvals. The schedule assumes that the AUC's approval of the YP Project, if granted, will allow for construction to commence as soon as reasonably possible upon receipt of such approval.

Table 4: Key Project Activities and Timelines

Activity or Milestone	Start Date	Target Completion Date
Consultation	Q2 2024	Ongoing
Land Rights Acquisition	Q2 2025	Q2 2026
Procurement and Detailed Engineering	Q3 2025	Q2 2026
Facility Application	Q4 2025	Q2 2026
Construction	Q3 2026	Q4 2027
Commissioning	Q3 2027	Q4 2027

7. If AP's receipt of the required approvals is delayed beyond the anticipated dates outlined in Table 4 above, the construction schedule and commissioning will be delayed and YP Project costs may increase.

2.4 YP Project Cost

8. Since the filing of the Need Application in 2024, AP has refined the capital cost estimate for the YP Project from a Class 4 estimate to a Class 3 estimate, which reflects an increase in accuracy to a level of +/-20%. As shown in Table 5 below, the updated capital cost forecast for the YP Project is \$2.937 billion, representing a total increase of 4.4% from the estimate that was previously provided to the AUC as part of the Need Application.³

Table 5: YP Project Capital Costs

Item	Size	Length (km)	Total (\$Millions)
YP Mainline	914 mm OD	235	2,727
YP Compressor Station	16.4 MW	N/A	191
YP Stations	N/A	N/A	19
Total Project Cost	-	-	2,937

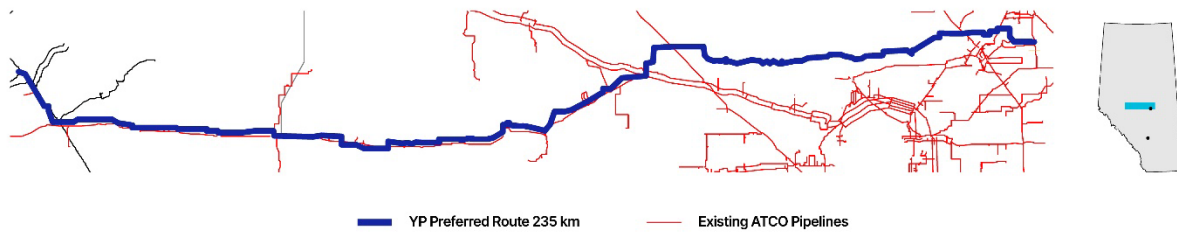
SECTION 3: ROUTE SELECTION

3.1 Overview

9. This section provides an overview of the methodology and process used by AP in the development of the Preferred Route of the YP Mainline, which is the route applied for in this Application, as shown in Figure 1 below.

³ Exhibit 29318-X0002, Table 7.5 and Table 7.6

Figure 1: YP Project Preferred Route (Applied for in this Application)



10. As shown in Figure 2 below, this process followed a staged approach starting with identifying the need for the YP Project, determining the system requirements, and identifying the study area, generating route options within the study area, evaluating the route options and selecting a preliminary preferred route, assessing the preliminary preferred route, and refining and confirming the Preferred Route.

11. Early engagement with landowners, occupants, agencies, and other interested parties that may be impacted by the YP Project played a critical role in the development of the Preferred Route and evaluation of the alternatives for the YP Project, and will continue to play an important role throughout the construction of the YP Project, by ensuring input from affected parties is received and can be properly incorporated into the project plans and execution. Please refer to Section 4 – Participant Involvement Program for more details on AP's engagement with interested and affected stakeholders.

Figure 2: Route Selection Process



12. Each of the above-referenced stages in the route selection process generally occurred in succession and are further described below.

Stage 1 – Determine System Requirements and Identify Study Area

- Review system needs considering new customer demand and future growth requirements;

- Identify and evaluate possible solutions to meet current and future system needs; and
- Determine required connection points and preliminary pipeline and facility sizing.

Stage 2 – Generate Route Options

- The generation of route options was influenced by the following factors, in no particular order:
 - Avoidance of environmentally sensitive areas;
 - Avoidance of areas which may present significant construction difficulties or the potential for long-term, on-going maintenance or remedial work;
 - Parallelling existing linear infrastructure and other linear features such as utility corridors, roadways, railways, and property lines;
 - The overall length of the pipeline and associated construction costs; and
 - Relatively direct path between required connection points.

Stage 3 – Evaluate Route Options and Select Preliminary Preferred Route

- An evaluation of each route option was conducted based on the following factors:
 - Stakeholder early engagement (e.g. landowners, Indigenous communities, municipalities, counties, regulators, general public, etc.);
 - Cost estimates;
 - Environmental impact; and
 - Technical complexity, constructability and operational considerations.
- Based on AP's evaluation of these factors, a preliminary preferred route was identified.

Stage 4 – Assessment of the Preliminary Preferred Route

- Consultation with the public, Indigenous communities, and landowners along the preliminary preferred route;
- Field assessments of the preliminary preferred route (e.g. survey, environmental, geotechnical and hydrotechnical studies); and
- Preliminary design completed for the preliminary preferred route.

Stage 5 – Refinement and Confirmation of the Preferred Route

- Confirmation of the Preferred Route based on AP's refinement and assessment, including feedback from consultation, of the preliminary preferred route.
- The Preferred Route is confirmed and this Application for the Preferred Route is submitted to the AUC for review and approval under AUC Rule 007.

13. The route selection process generally involved the identification and evaluation of the study area and development and refinement of routing concepts/segments, routing assessments and analysis, as well as preliminary stakeholder engagement on route options, which helped to define the preliminary preferred route. Further assessment and refinement of the preliminary preferred route ultimately resulted in the Preferred Route, which is the applied-for route for the YP Mainline. The following sections describe in greater detail how each stage was applied to the YP Mainline.

3.2 Stage 1 – Determine System Requirements and Identify Study Area

14. As discussed in the Need Application, through the comprehensive system design process, NGTL, collaborating with AP, considered multiple alternatives to meet the increased demand on the Integrated Alberta System.⁴ Through this review, it was determined that the Peace River Area is expected to provide an increasing share of the aggregate system supply; therefore, it was considered optimal to ensure that flows out of

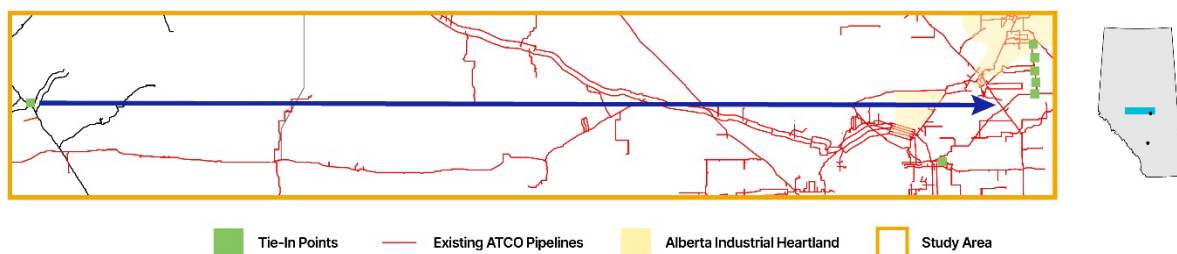
⁴ Exhibit 29318-X0002, Section 5.

the Peace River Area were as direct and efficient as possible to meet the growing demand on the Integrated Alberta System, and particularly in the Greater Edmonton Area.⁵

15. Through this analysis, it was determined that the construction of a new major flow corridor from the NGTL January Creek Transmission pipeline to the Greater Edmonton Area was the best configuration due to its operational efficiency, reliability, and overall Cumulative Present Value of Revenue Requirement (CPVRR). The need for the YP Project was presented to the Commission in the Need Application, which the Commission approved in Decision 29318-D01-2025.

16. Based on preliminary planning and hydraulic assessments completed by NGTL and AP, it was determined that the proposed pipeline would need to connect NGTL's January Creek Pipeline near Peers, Alberta to AP's Inland Transmission System in the Greater Edmonton Area. A single west connection point was identified on the January Creek Pipeline in NE 27-54-14-W5M. Six potential east connection points were identified on AP's Inland Transmission System, as shown in Figure 3 below. Having regard to the potential connection points, a broad study area was established, and AP focused on developing routing concepts between the connection points.

Figure 3: Study Area for the Yellowhead Pipeline Project



17. The study area for the YP Project, aside from urban centres (such as Edmonton, Fort Saskatchewan, St. Albert, Spruce Grove, Stony Plain, etc.) primarily consists of privately owned agricultural lands with relatively small amounts of public (i.e., Crown)

⁵ Exhibit 29318-X0002, Section 3.1.

lands. The study area encompasses a number of existing linear infrastructure features, including major and minor roadways, railways, electric utilities and pipelines, and includes (west to east) the following municipalities:

- Yellowhead County;
- Parkland County;
- Lac Ste. Anne County;
- Sturgeon County;
- The City of Edmonton;
- The City of St. Albert;
- The City of Fort Saskatchewan; and
- Strathcona County.

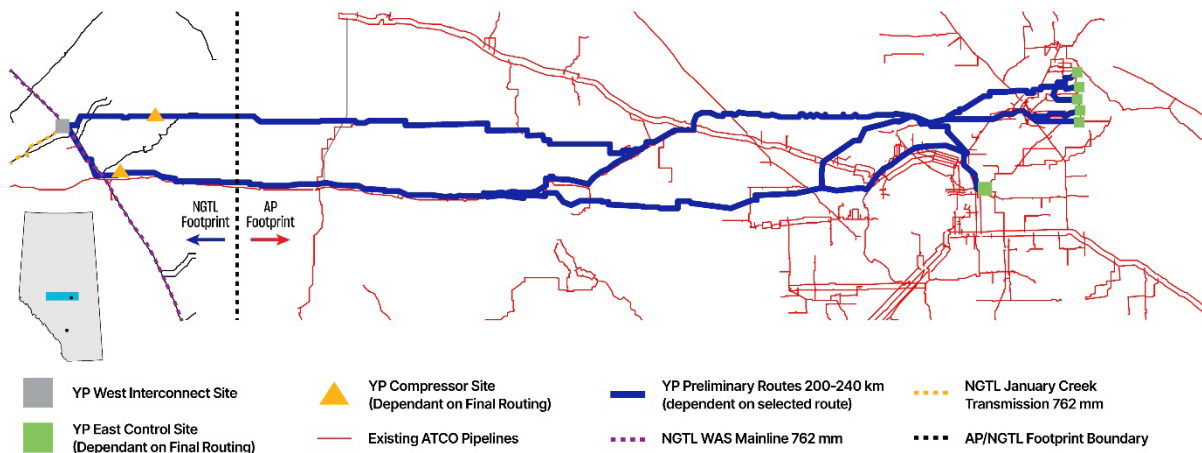
3.3 Stage 2 – Generate Route Options

18. To develop the initial routing options/segments for evaluation, AP examined the study area shown in Figure 3 above. AP generated route options based on the following routing criteria (in no particular order of priority):

- Avoidance of environmentally sensitive areas;
- Avoidance of areas which may present significant construction difficulties or the potential for long-term, on-going maintenance or remedial work;
- Parallelling existing linear infrastructure and other linear features such as utility corridors, roadways, railways, and property lines;
- The overall length of the pipeline and associated construction costs; and
- Relatively direct path between required connection points.

19. Based on AP's and third-party experience and expertise, the route options generated for further evaluation are shown in Figure 4 below.

Figure 4: Route Options for the YP Mainline



3.4 Stage 3 – Evaluate Route Options and Select Preliminary Preferred Route

20. Once the routing options were developed, AP engaged experienced professionals in the fields of pipeline engineering, geotechnical and hydrotechnical engineering, environment, land survey, pipeline construction, land use, land acquisition, and land valuations to complete desktop assessments of the routing options shown in Figure 4. Through these assessments, each unique segment of the route options was evaluated based on the following criteria:

Stakeholder support

This considered an assumed level of support and consideration for landholders, Indigenous communities and traditional land use, Government Authorities, parallel existing facilities, interest groups, industry, and transportation infrastructure.

Environmental Impact

This considered sensitive or restricted areas, paralleling existing disturbances, Parks and Protected Areas, areas with significant Historical Resource Value, wetlands, watercourse crossings, and White versus Green areas.⁶

⁶ Alberta is separated into two general zones of land management - White areas are primarily private land for residential and agricultural development with <25% public land. Green area is predominantly public lands managed by the province including Parks and Protected Areas.

Technical Complexity and Constructability

This considered construction accessibility (proximity to developed roads and trails, accommodation availability, adequate laydown and storage locations), construction efficiency/difficulty, access to water, major crossings and logistics, congested areas, potential for shallow bedrock, potential for high groundwater, and geohazards.

Cost

This considered the overall cost of the route including materials, land acquisition, and pipeline construction.

Operational Considerations

This considered system reliability, flexibility, and operating expenses.

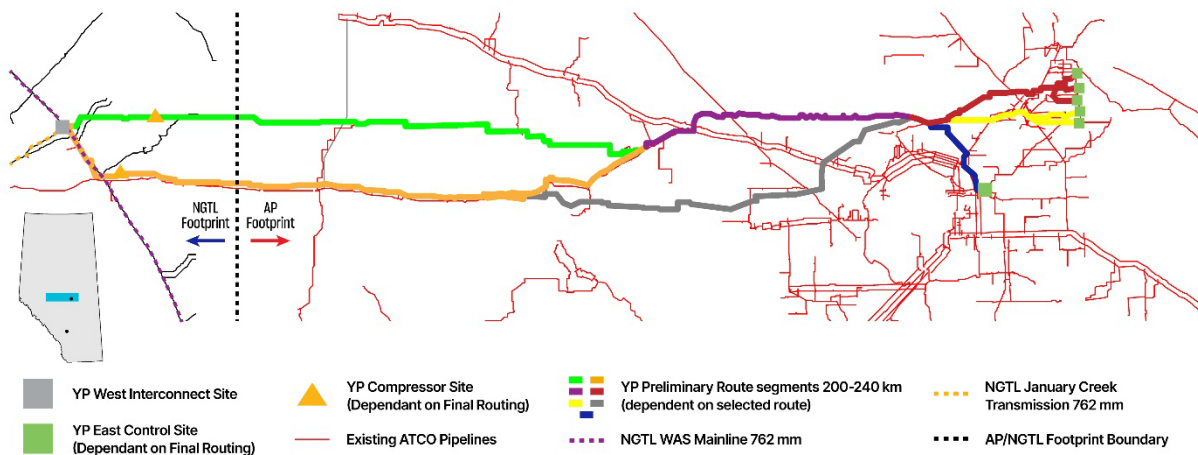
21. The goal of the desktop evaluations was to identify and potentially eliminate less viable routing concepts prior to beginning any in-field work as a matter of efficiency and cost prudence.

22. At the conclusion of the initial desktop evaluations, and specifically in the eastern segments of the route in the Greater Edmonton Area (e.g., Stony Plain, Spruce Grove, St. Albert), AP determined that the more northern route segments were preferable over the southern route segments. AP also concluded that the least preferred segment was that located within the Edmonton Transportation/Utility Corridor (TUC). Developing a feasible pipeline route into the TUC on the west side of Edmonton was determined to be extremely challenging due to a variety of technical constraints. Further, based on AP's experience with design (including consultation and regulatory approvals), installation, and operation of pipelines within the Edmonton TUC, AP removed the route segment that included the Edmonton TUC from further consideration.

23. However, given that the desktop evaluations were based on an assumed level of stakeholder support, AP was not prepared, at this stage, to remove other route segments from consideration even though they were considered to be less preferable (e.g., the segments in the Stony Plain, Spruce Grove, St. Albert areas) than the more northern segments.

24. Following the foregoing desktop evaluations, AP identified seven potentially viable segments, which provided for a total of nine different route options. These segments included two western segments, known as West 1 (orange) and West 2 (green), two central segments, known as Central 1 (purple) and Central 2 (white⁷), and three primary eastern segments, known as East 1 (red), East 2 (yellow), and East 3 (blue), as illustrated in Figure 5 below.

Figure 5: Yellowhead Pipeline Seven Potential Viable Segments Map



25. The following section provides a summary of the segment options in the western, central, and eastern sections of the routes.

3.3.1 Western Route Area

3.3.1.1 West 1 (orange) (NE-27-54-14-W5 to SE-14-54-3-W5)

26. The West 1 (orange) route is located in Yellowhead County, Parkland County, and Lac Ste. Anne County and is comprised of a mix of forested, cultivated, tame pasture, and residential land uses. This segment of the route runs south from the tie-in location near Peers following existing pipelines, then east generally running adjacent to the Trans Mountain Expansion Pipeline (TMX) and passing south of Chip Lake before crossing the Pembina River. From there, it continues east and then north, generally paralleling existing

⁷ For ease of visibility, the Central 2 (White) segment is shown in grey in Figure 5.

roadways, property lines, and pipelines (including existing AP pipelines), until it terminates southeast of Lac Ste. Anne.

3.3.1.2 West 2 (green) (NE-27-54-14-W5 to SE-14-54-3-W5)

27. The West 2 (green) route is located in Yellowhead County, Parkland County, and Lac Ste. Anne County and is comprised of a mix of forested, cultivated, tame pasture, and residential land uses. This route runs east from the tie-in location near Peers, passes north of Chip Lake, crosses the Pembina River, and continues east through further greenfield areas to its termination point southeast of Lac Ste. Anne.

3.3.2 Central Route Area

3.3.2.1 Central 1 (purple) (SE-14-54-3-W5 to SW-33-54-24-W4)

28. The Central 1 (purple) segment of the pipeline connects with the western route segment at the southeast corner of Lac Ste. Anne and is located in Lac Ste. Anne County and Sturgeon County. This area is a mix of forested, cultivated, tame pasture, and residential uses. This route generally runs northeast until Oneway, before heading east, and following in general proximity to Highway 37. It terminates near the Canadian Forces Base north of Edmonton.

3.3.2.2 Central 2 (white) (SE-14-53-6-W5 to SW-33-54-24-W4)

29. Central 2 (white) connects to West 1 (orange) east of Wabamun Lake and is located in Parkland Country and Sturgeon County. The route continues east generally following the Yellowhead highway corridor and TMX, past Stony Plain and Spruce Grove, where it travels north past Lois Hole Provincial Park and St. Albert until reaching the same end point as Central 1 (purple).

3.3.3 East Route Area

30. For the eastern part of the pipeline route, East 1 (red), East 2 (yellow), and East 3 (blue) follow different paths, largely constrained by limited feasible locations to cross the North Saskatchewan River, to reach suitable connection locations on the existing AP Inland system.

3.3.3.1 *East 1 (red) (SW-33-54-24-W4 to SE-15-55-21-W4)*

31. The East 1 (red) segment will connect with the central segments near the Canadian Forces Base north of Edmonton. This area has a mixed environment, including stabilized sand dunes and a high number of waterbodies. The East 1 (red) segment runs northeast away from its connection point with the central routes, before shifting east to cross the North Saskatchewan River, and then south, crossing Highway 15 and the Scotford Railway, before once again heading east to tie-in with the existing AP Salt Cavern Transmission Pipeline.

3.3.3.2 *East 2 (yellow) (NW-35-54-24-W4 to SE-35-54-22-W4)*

32. East 2 (yellow) runs east, paralleling Highway 37, then crosses the North Saskatchewan River, a CN railway, Highway 15, and an industrial area within Fort Saskatchewan before terminating at the AP Salt Cavern Transmission Pipeline.

3.3.3.3 *East 3 (blue) (SW-33-54-24-W4 to SE-21-53-23-W4)*

33. East 3 (blue) initiates at the downstream end of the central segments and heads east/southeast, before crossing Highway 15 and continuing south until it reaches and enters the TUC, then parallels the Anthony Henday Highway before crossing the North Saskatchewan River. It then continues south in the TUC crossing Aurum Road, before terminating near AP's existing Cloverbar compressor station.

3.3.4 Analysis of Preliminary Route Options

34. This section provides an analysis of the potential preliminary route options. Please refer to Table 6 below for the key attributes of the preliminary route options.

Table 6: Attributes of Route Options

Route (segments)	Length (km)	Private Parcels	Crown Parcels	Approx. Parallel Existing Disturbances	# of Major Trans. Crossing	Overlap with ESA (% of Route)	Affected Parks and PA	HRV Sites in Prox (500 m)	Semi Perm/ Perm Wetlands	% of White Area	HDD Count	Congested Areas (km)	High Ground Water Table (% of Route)	Shallow Bedrock (% of Route)	Geohazard (m)
Orange-White-Blue	205	524	54	92.9%	21	43.6%	2	35	59	99%	17 Total 9 Difficult	19	14	2.1	Subsidence – 2390 Landslides Low – 5250 Landslides Mod – 230 Landslides High – 1310
Orange-Purple-Blue	201	452	48	97.3%	24	27%	0	31	66	99%	12 Total 10 Difficult	9	12.7	0.3	Subsidence – 2530 Landslides Low – 3840 Landslides Mod – 1050 Landslides High – 1310
Green-Purple-Blue	196	319	88	42.6%	21	30.1%	0	25	76	94%	15 Total 11 Difficult	9	19	4.1	Subsidence – 2140 Landslides Low – 2970 Landslides Mod – 1680 Landslides High – 2320
Orange-White-Yellow	217	563	48	91.7%	28	46.6%	2	18	58	99%	17 Total 8 Difficult	12	13.2	1.9	Subsidence – 250 Landslides Low – 5410 Landslides Mod – 330 Landslides High – 1180
Orange-Purple-Yellow	212	491	42	95.8%	31	31.1%	0	14	65	99%	12 Total 9 Difficult	2	12	0.2	Subsidence – 390 Landslides Low – 4000 Landslides Mod – 1150 Landslides High – 1180
Green-Purple-Yellow	207	358	82	44.5%	28	20.8%	0	8	75	94%	15 Total 10 Difficult	2	17.9	3.8	Subsidence – 0 Landslides Low – 3130 Landslides Mod – 1780 Landslides High – 2190
Orange-White-Red	219	547	48	93.2%	27	39%	2	34	59	99%	18 Total 7 Difficult	12	13.3	1.9	Subsidence – 250 Landslides Low – 5120 Landslides Mod – 380 Landslides High – 1180
Orange-Purple-Red	214	457	42	97.3%	30	57.1%	0	30	66	99%	13 Total 8 Difficult	2	12.1	0.2	Subsidence – 390 Landslides Low – 3710 Landslides Mod – 1200 Landslides High – 1180
Green-Purple-Red	209	342	82	46.6%	27	49.3%	0	24	76	94%	16 Total 9 Difficult	2	18	3.8	Subsidence – 0 Landslides Low – 2840 Landslides Mod – 1830 Landslides High – 2190

35. As outlined in Section 4, AP carried out a broad early engagement program on the seven preliminary route segments. This included:

- Meetings and discussions with directly affected landholders, local, municipal authorities, and Indigenous groups;
- Acquisition of consent to survey from directly affected landholders on each segment, allowing for preliminary design and field studies including survey, environmental, geotechnical and hydrotechnical to begin on preferred segments; and
- Notification to all landowners within 1 km via media and a door hangar program for the 10 open houses in communities along the pipeline segments.

36. The additional information that was gathered through the early engagement process was taken into consideration to introduce actual stakeholder support data in place of the assumed stakeholder support used in the desktop evaluations to this point.

37. The results of the desktop evaluations with the incorporation of stakeholder feedback from the early engagement process is shown below in Table 7.

38. In the overall route selection process, these results were considered an initial evaluation of the routes and used to identify the generally more favourable routes at this time, prior to carrying out further analysis.

Table 7: Initial Results for Routes based on the Desktop Evaluation and Updated Stakeholder Support Data

Route No.	Route Options Combination)	(Segment	Cost	Stakeholder Support	Environmental Impact	Technical Complexity & Constructability	Operational Considerations	Total Weighted Score
			25%	25%	25%	20%	5%	100%
1	West 1-Central 2-East 3 (Orange-White-Blue)		7.0	4.8	6.7	5.9	8.5	6.2
2	West 1-Central 1-East 3 (Orange-Purple-Blue)		9.3	7.0	7.1	7.0	7.0	7.6
3	West 2-Central 1-East 3 (Green-Purple-Blue)		10.0	5.7	5.3	6.0	3.5	6.6
4	West 1-Central 2-East 2 (Orange-White-Yellow)		6.6	4.9	5.9	7.1	7.5	6.1
5	West 1-Central 1-East 2 (Orange-Purple-Yellow)		9.0	6.7	6.5	8.2	6.0	7.5
6	West 2-Central 1-East 2 (Green-Purple-Yellow)		9.6	5.7	5.0	7.1	3.0	6.6
7	West 1-Central 2-East 1 (Orange-White-Red)		6.1	4.9	6.3	7.2	7.5	6.1
8	West 1-Central 1-East 1 (Orange-Purple-Red)		8.5	6.8	6.1	8.2	6.5	7.3
9	West 2-Central 1-East 1 (Green-Purple-Red)		9.2	5.9	4.9	7.4	3.0	6.6

39. A summary comparing the western, central, and eastern portions of the route has been provided below to aid in understanding the high-level differences between individual segments (opposed to the combined route or combinations of segments).

3.3.4.1 Comparison of Western Segments

40. While West 2 (green) is preferred over West 1 (orange) from a cost perspective due to less length of pipeline required, as West 2 (green) is a more direct route compared to West 1 (orange), West 1 (orange) is preferred in regard to Stakeholder Support, Environmental Impact, Technical Complexity & Constructability, and Operational Flexibility. A significant driver in the positive scoring for West 1 (orange) was the significant proportion of the alignment running in parallel to existing facilities and other linear disturbances.

41. Paralleling existing disturbances is generally preferred over greenfield options. A considerable number of stakeholders strongly opposed the West 2 (green) option due to the impacts associated with constructing a pipeline in a less developed corridor. Please refer to Section 4 of this Application for further details in regard to the opposition for the West 2 (green) segment.

42. Given the above, West 1 (orange) was the preferred segment for the western route of the pipeline.

3.3.4.2 Comparison of Central Segments

43. Routes containing Central 2 (white) scored lower than equivalent routes containing Central 1 (purple) in Cost, Stakeholder Support, and Technical Complexity and Constructability. In addition, through the early engagement program, it was determined that there was an overall preference from landowners for the Central 1 (purple) segment due to the presence and proximity of several rural subdivisions and communities along the Central 2 (white) segment, and there were no reasonable or cost-effective options to route around these areas. Please refer to Section 4 of this Application for further details regarding stakeholder opposition to the Central 2 (white) segment.

44. This resulted in Central 1 (purple) being the preferred segment for the central route of the pipeline primarily based on Stakeholder Support.

3.3.4.3 Comparison of Eastern Segments

45. The eastern segments, East 1 (red), East 2 (yellow), and East 3 (blue) all scored similarly, with East 3 (blue) being slightly less preferable overall. While East 3 (blue) fared better in some areas due to the lesser length of pipeline required, East 1 (red) and East 2 (yellow) had superior scoring in Technical Complexity & Constructability.

3.3.4.4 Discussion

46. The results and narrative above enabled a few observations and determinations to be made:

- The top three routes are orange-purple-blue, orange-purple-yellow, and orange-purple-red, noting that West 1 (orange) and Central 1 (purple) are common to all three;
- There are no substantial differences between routes that contain the red, yellow or blue east segments when the west and central segments are equal; and
- Routes containing Central 2 (white) scored the lowest and therefore Central 2 (white) was eliminated from further consideration.

47. A further and more comprehensive desktop review of the west and east segments was also completed. The more comprehensive review involved more time and effort for evaluation and comparison of certain individual segments (as opposed to the combined route or combination of segments). The results, which also utilized the actual stakeholder support data gathered in the early engagement program, are shown in Table 8 below.

Table 8: Desktop Evaluation of West and East Route Options

Segment	Colour	Cost	Stakeholder Support	Environmental Impact	Technical Complexity & Constructability	Operational Considerations	Total Weighted Score
		25%	25%	25%	20%	5%	100%
West 1	Orange	9.0	6.0	6.9	7.4	6.5	7.3
West 2	Green	10.0	4.3	4.8	7.1	3.5	6.4
East 1	Red	7.5	5.4	6.8	8.6	5.5	6.9
East 2	Yellow	9.2	5.2	6.2	7.5	5.5	6.9
East 3	Blue	10.0	5.6	6.2	4.2	6.0	6.6

48. This affirmed that the West 1 (orange) segment was preferable over the West 2 (green) segment, and that further analysis was warranted on the eastern segments.

3.3.4.5 *Further analysis of eastern tie-in locations*

49. AP completed a further evaluation of the proposed east tie-in locations. As mentioned above, the potential eastern routing segments were evaluated during the desktop assessment, but this assessment did not fully discern the advantages and disadvantages of the segments resulting in a certain segment being preferred.

50. AP completed a dedicated analysis of the proposed east tie-in locations by completing site visits to evaluate proposed east tie-in locations for the following:

- Feasibility and siting (including consideration for footprint requirements to accommodate an in-line inspection receiver, a control station, and a tie-in valve assembly which will require a 50 x 55 m site, access, and proximity to power supply);
- Constructability (including consideration for terrain, and environmental and geotechnical concerns); and
- System hydraulic benefits.

51. Based on this analysis, tie-in options on the East 1 (red) and East 2 (yellow) segments were considered preferable, whereas the East 3 (blue) segment was considered less preferred due to relatively significant technical complexity and constructability challenges, as well as less hydraulic benefit to the system – potentially requiring some looping of the AP Cloverbar pipeline.

52. Based on the foregoing, the East 3 (blue) segment was eliminated from further consideration.

3.3.4.6 *East segment constraints analysis*

53. With two eastern route segments still viable following the above-mentioned analysis, AP completed an additional east segment constraint analysis to further evaluate the East 1 (red) and East 2 (yellow) segments with consideration for:

- Landholder feedback, routing validity and refinement potential, and detailed alignment feasibility for each;

- East tie-in site considerations coupled with landholder support for each tie-in location; and
- System hydraulic benefits.

54. Through this analysis, it was determined that the East 1 (red) segment was preferred over the East 2 (yellow) segment for each consideration listed above.

55. A summary of the relative ranking, taking all analyses into account, for the route segments (Figure 5) is provided in Table 9 below.

Table 9: Relative Ranking for Route Segments

Segment	Considerations					Result
	Stakeholder Support	Environmental Impact	Technical Complexity and Constructability	Cost	Operational Considerations	
West 1 (orange)						Preferred Segment
West 2 (green)						Not Preferred Segment
Central 1 (purple)						Preferred Segment
Central 2 (white)						Not Preferred Segment
East 1 (red)						Preferred Segment
East 2 (yellow)						Not Preferred Segment
East 3 (blue)						Not Preferred Segment

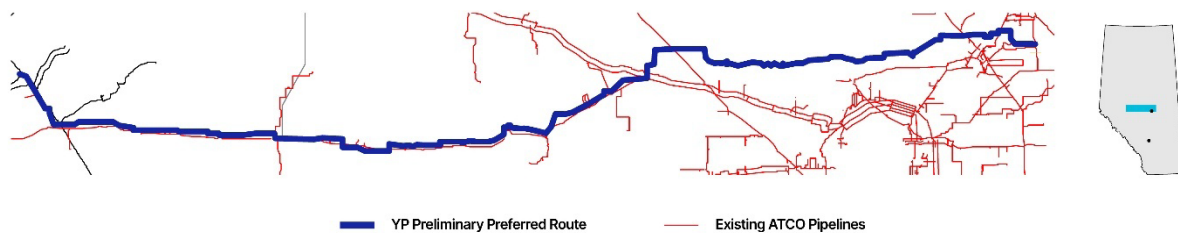
Note: A green circle indicates that a segment is preferred for that category. An orange circle indicates that a segment is not preferred for that category. A red circle indicates that a segment is not acceptable for that category. In instances where the segments being compared share the same colour there is no significant difference between the segments for that category.

56. Based on the above, the preferred segments are West 1 (orange), Central 1 (purple), and East 1 (red). Therefore, these segments formed the preliminary preferred route.

3.5 Stage 4 - Assessment of Preliminary Preferred Route

57. As a result of the overall routing selection process, AP selected the preliminary preferred route comprised of the combination of the West 1 (orange), Central 1 (purple), and East 1 (red) segments, as shown in Figure 6 below.

Figure 6: Preliminary Preferred Route



58. As shown in Figure 6, the preliminary preferred route ties-in to the NGTL January Creek Pipeline at NE-27-54-14-W5 near Peers, Alberta, and runs south-east to Highway 16 (Yellowhead Highway), before heading east with portions adjacent to the recently installed TMX pipeline, and AP's existing Hinton-Wabamun pipeline. The preliminary preferred route passes south of Chip Lake and crosses the Pembina River near Entwistle, Alberta, and continues east past Fallis, turning north/northeast for approximately 46 km to the southeast of Lac Ste. Anne. The route then proceeds east to Onoway, Alberta, generally following Highway 37 past Namao. It then heads northeast, crossing the North Saskatchewan River at SE-23-55-22-W4M, before entering the Alberta Industrial Heartland. It then runs east/southeast to its terminus at the tie-in point to the AP Salt Cavern Transmission Pipeline at SE-15-55-21-W4M.

59. AP continued engagement (further detailed in Section 4), completed detailed field investigations and preliminary pipeline design, and commenced right-of-way acquisition discussions, based on the preliminary preferred route.

3.6 Stage 5 - Refinement and Confirmation of the Preferred Route

60. Following AP's selection of the preliminary preferred route, it continued engagement with landholders and stakeholders and solicited additional input in parallel with its preliminary pipeline design and land acquisition discussions.

61. In addition, AP continued field studies to refine and optimize the pipeline route through each parcel in consideration of technical requirements such as watercourse crossings, highway crossings, rail crossings, and land features such as wetlands.

62. This iterative and collaborative process resulted in many relatively minor route refinements and the finalization of the Preferred Route, which is the applied-for route in this Application, as shown on Attachment A1.

63. AP submits that the work completed throughout the route selection process, detailed above, demonstrates that the applied-for Preferred Route best satisfies the needs of the YP Project while accounting for significant stakeholder input. Please refer to Attachments A1 and A2 for the Right of Way Plan and Geospatial Data of the YP Mainline segments.

3.7 Facility Locations

64. In siting the facility components of the YP Project, namely the YP West Interconnect, YP East Control Station, and YP Compression Station (collectively, the YP Facilities), AP sought locations that would be technically viable, environmentally suitable, and compatible with existing and planned land uses and land-use zoning. The site selection processes for the YP Facilities are described in Sections 3.6.1, 3.6.2, and 3.6.3 below.

65. The following general facility sitting criteria were applied by AP:

- Proximity to existing infrastructure and site access – close proximity to existing infrastructure ensures access to the site and minimizes operational costs while maximizing operational efficiency;

- Geographical and topographical suitability – terrain is stable and relatively flat to allow for safe construction and operation, and limit issues with poor grading; and
- Scalability – the ability to accommodate future expansions or upgrades.

3.6.1 YP West Interconnect

66. The YP Project requires the installation of the YP West Interconnect, an interconnection with the NGTL January Creek Pipeline at NE-27-54-14-W5M. The YP West Interconnect is the receipt point where natural gas enters the YP Project. This location was specified by NGTL as it best utilizes existing valves and access points on the January Creek Pipeline.

3.6.2 YP East Control Station

67. The YP Project requires the installation of the YP East Control Station at SE-15-55-21-W4M where the YP Mainline will connect to AP's existing Inland Transmission System. The YP East Control Station will serve as the delivery point where natural gas exits the YP Project and flows into the Inland Transmission System. The YP East Control Station is necessary as it will regulate the flow rate and pressure of the gas coming into the Inland Transmission System from the YP Project. The location of the YP East Control Station was primarily driven by the selection of the eastern pipeline route segment and the further analysis of the east tie-in points described above in Section 3.4.4. The chosen location for the YP East Control Station is relatively flat, poses no concerns from landholders or other potentially affected stakeholders, and has sufficient space.

3.6.3 YP Compressor Station

68. The YP Project requires the installation of the YP Compressor Station, a 16.4-megawatt (MW) compressor located near Peers, Alberta, at SE-33-53-13-W5M. The YP Compressor Station is required for the flow of gas from the receipt point at the YP West Interconnect through the YP Mainline to the delivery point at the YP East Control Station.

69. The primary selection criteria for the YP Compressor Station were similar to the general facility siting criteria listed above, and included the following:

- A large, flat, plateaued area to support the compressor station specifications to reduce the need for grading and the risk of poor drainage;
- Overall environmental impact;
- Adequate soil conditions that would support the compressor site;
- Available space for the temporary workspace and storage areas;
- Ability to access a reliable power supply; and
- Accessibility through existing roads or ability to build access roads.

70. During the initial siting investigation, AP evaluated whether it could utilize existing access and infrastructure sites. It was determined that the West 1 (orange) preliminary route segment was located near AP's existing Peers Compressor Station. However, after preliminary design and evaluation of this site, AP determined that there was insufficient spacing at the existing Peers Compressor Station to meet the requirements of the YP Compressor Station.

71. Following consultation with landowners in the area, AP determined that SW-34-53-13-W5M would be the best location for the YP Compressor Station site. A site located directly west (SE 33-53-13-W5M) of the proposed YP Compressor Station site was also considered but ruled out due to potential issues with grading and landowner concerns. The surrounding area was investigated to determine if there was another viable area for the location of the Compressor Station, but ultimately the landowner preferred not to have it located on other portions of the property.

72. The proposed site meets the technical and functional specifications required for the YP Compressor Station. Further, the proposed site best satisfies the requirements under AUC Rule 007 regarding impacts on landowners and occupants:

- The proposed site is 375 m from the nearest currently occupied residence;

- Forecast audible noise levels are compliant with AUC Rule 012. Please refer to Section 5.3 for more information on audible noise levels;
- The location of the proposed site is situated in the landowner's preferred location and is located such that the visual impacts of the YP Compressor Station will be mitigated; and
- The proposed site is located less than 300 m north of an AltaLink substation and adjacent to an existing Fortis power line. Service to the YP Compressor Station will be provided by installing a new powerline from the substation through the existing Fortis power line right-of-way thereby minimizing impacts to landowners and occupants.

SECTION 4: PARTICIPANT INVOLVEMENT PROGRAM (PIP)

4.1 Overview

73. In accordance with AUC Rule 007, AP undertook an extensive Participant Involvement Program (PIP) for the YP Project. AP's PIP included consultation with the public including landowners and occupants (collectively, landholders), local and municipal authorities, provincial governmental agencies, Indigenous groups, industry, and non-governmental organizations. AP's early engagement and consultation activities in respect of the YP Project have been ongoing since Q2 2024 and will continue for the duration of the YP Project.

74. In designing and executing the PIP, AP sought to inform and consult with all stakeholders who may be directly and adversely affected by the YP Project. AP implemented an Indigenous consultation program to ensure meaningful engagement and discussion with Indigenous groups. In addition to the early engagement on the route segment options, this included traditional land use consultation for the preliminary preferred route with communities identified by the Aboriginal Consultation Office (ACO), as well as other Indigenous groups requesting consultation.

75. Affected landholders received project updates related to their interest in each land parcel during the planning process and will be informed of the construction schedule and details before construction begins. The nearest residence is approximately 0.02 km from the centerline of the applied-for Preferred Route, and the nearest surface developments

are approximately 0.01 km from the centerline and approximately 0.01 km from the YP Compressor Station property boundary and 0.03 km from the YP Compressor Station site itself.

76. AP considers the PIP to be a critical part of the planning and development process as it provides impacted stakeholders with project-specific information, opportunities to raise concerns, and ask questions, which in turn assists AP with identifying potential options, alternatives, and mitigation measures to address these concerns. Feedback received from all participants was carefully considered and incorporated into project planning and design, including route selection. AP undertook these activities with the commitment to work with potentially impacted and interested parties to discuss options, address concerns raised, and where possible, resolve issues. AP submits that, through consultation and other input from stakeholders, it has put forward the best possible route for the YP Project.

77. AP's PIP for the YP Project consisted of the following stages:

Stage 1 – Early Engagement on the Seven Viable Route Segments

- First Round Consultations – preliminary personal consultation on the seven route segments; and
- Open Houses – public input sought on the seven route segments through open houses and project email.

Stage 2 - Engagement on Preliminary Preferred Route

- Public Notification of Preliminary Preferred Route – preliminary preferred route announced, and public input sought;
- Second Round Consultations – formal personal consultations on the preliminary preferred route, and ultimately the Preferred Route, including confirmations of non-objection;
- Open Houses – public input on the preliminary preferred route sought through open houses and project email; and
- Resolution of Concerns – route refinements identified, and mitigations implemented, ultimately resulting in the Preferred Route.

Stage 3 – Ongoing Resolution of Concerns

- Ongoing Resolution of Concerns – continued engagement to resolve outstanding issues will continue throughout the duration of the YP Project.

78. The timing and general description of the activities in AP's PIP are outlined in Table 10 below. Details associated with each stage of the program are described in Section 4.2 to 4.3.

Table 10: Key AP Program Activities

Timing	Activity/Milestone
Stage 1 – Early Engagement on the Seven Viable Route Segments	
Q2, 2024 – Q1 2025	First Round Consultation – Early meetings and discussions with provincial governmental agencies, local and municipal authorities, industry, and other interested parties. Over 1,284 notifications and consultations were conducted with landowners, occupants, agencies, municipalities, industry, Indigenous groups, and other interested parties.
Q4, 2024 and Q1 2025	Open Houses on Seven Route Segments – Open houses were held in 10 locations and resulted in consultation with 386 attendees as part of the early engagement on the seven route segment options.
Stage 2 - Engagement on Preliminary Preferred Route	
Q2, 2025	Public Notification of Preliminary Preferred Route – preliminary preferred route was made public on the YP website on February 21, 2025 and public consultation began.
Q2, 2025	Open Houses on Preliminary Preferred Route – Open houses were held in 6 locations and had 187 attendees.
Q2 and Q3, 2025	Second Round Consultation and Notification on Preliminary Preferred Route – AP conducted personal consultation with occupants, residents, landowners, First Nation reserves, and Metis Settlements within or directly adjacent to the pipeline right-of-way of the preliminary preferred route, and ultimately the Preferred Route, and those who requested consultation after receiving notification (or otherwise convey objections). In addition, AP conducted personal consultation with occupants, residents, landowners, First Nation reserves, and Metis Settlements within 0.5 km of the YP Compressor Station site boundary. AP provided notifications to Crown disposition holders, local authorities along the right-of-way and urban authorities within 1.5

Timing	Activity/Milestone
	km of the preliminary preferred route, and ultimately the Preferred Route, and also provided notifications to occupants, residents, landowners, First Nation reserves, and Metis Settlements within 0.2 km. AP provided notifications to Crown disposition holders, local authorities and occupants, residents, landowners, First Nation reserves, and Metis Settlements within 1.5 km of the YP Compressor Station site boundary. Confirmations of non-objection were received from occupants, residents, landowners, First Nation reserves, and Metis Settlements within the pipeline right-of-way of the preliminary preferred route and ultimately the Preferred Route, and adjacent to the YP Compressor Station site boundary.
Q2 and Q3, 2025	Resolution of Concerns – route refinements identified and mitigations implemented, ultimately resulting in the Preferred Route. AP will continue to engage stakeholders regarding outstanding concerns as noted below in Stage 3.
Stage 3 – Ongoing Resolution of Concerns	
Ongoing	Resolution of Concerns – continued engagement to resolve outstanding issues will continue throughout the duration of the YP Project.

79. AP is committed to an open and transparent PIP throughout the duration of the YP Project and will continue to work and consult with participants to resolve any outstanding issues following the filing of this Application. As the YP Project progresses, stakeholders will be continually informed of any changes to the YP Project plans as new information becomes available. Stakeholders on the final approved route and in the vicinity of the YP Project facilities will be notified of the construction schedule and provided details prior to the commencement of construction.

4.2 Stage 1 – Early Engagement on Seven Potential Route Segments

80. Early engagement on the seven potential route segments was initiated in Q2 of 2024. These activities included discussions with government, industry, Indigenous groups, and other stakeholders. The purpose of engagement at this stage was to inform these parties of the nature of the YP Project and that route planning was underway, and

to obtain preliminary information with respect to environmentally sensitive areas, industrial activity, and development plans within each municipality.

4.2.1 Notification and Consultation

81. Participant identification activities began during this stage. Stakeholders identified for inclusion in the PIP on the seven potential route segments included directly affected landholders, local and municipal authorities, and Indigenous groups. These parties were identified from readily available directories and local knowledge. Early discussion with these participants helped identify additional parties for inclusion in engagement activities.

82. AP also completed notifications with landholders on the various route segment options. To determine the initial base of impacted landholders, freehold and Crown land interest searches were conducted to identify the registered interest holders on all directly affected land parcels. Certificates of Title for freehold lands were retrieved electronically from the Alberta Land Titles Spatial Information System (SPIN2) in bulk using either legal land locations or the Land Identification Number Code, via AltaLIS digital mapping. AP then reviewed each Certificate of Title and the spatial extent of each associated land parcel. Public Land Standing Reports (PLSR) for Crown lands were also retrieved using the Surface Public Standing Search application. The PLSRs were used to identify the “Ownership Status,” “Activity,” and “Titles” associated with the subject Crown lands.

83. Once completed, this information was added to a project consultation tracking database to document the information collected during the PIP. The database included information such as the participant’s name and contact information, description of the parcel(s) held by the participant, records of land titles for each parcel, communication with the participant throughout the engagement process, as well as documentation of follow-up requests and any corresponding follow-up activities identified during consultation meetings.

84. During subsequent consultation meetings, all stakeholders were requested to identify other land interest holders on their property who should be consulted, including renters or others absent from land titles, to ensure that all individuals potentially impacted

by the YP Project would receive notification. Once identified, these stakeholders were added to the consultation database to ensure they received future notifications and consultation as required. Additional stakeholders were later added to the system through self-identification at the open houses or through contacting AP directly.

85. To ensure all stakeholders are being captured over the life of the YP Project, an automated spatial land assessment is completed monthly to identify and update any changes in the physical extent of land parcels that resulted from new subdivisions. A comprehensive refresh of the land title data for the YP Project is also completed prior to any project-wide engagement, so new landowners can be identified and included in the PIP.

86. When the seven route segments and landholders were identified, AP initiated the public notification stage of the PIP. The purpose of this stage was to explain the potential impacts of the YP Project to participants, documenting and responding to the views and concerns of participants and collecting site-specific information about potential impacts to stakeholders and their land interests. AP sought to conduct personal consultations with all landowners, occupants, residents, and land interest holders on or directly adjacent to affected parcels of the route segment options. These consultations were conducted in person, by phone, or through other means of correspondence, based on the participant's preference.

87. Through its investigation, AP identified approximately 1,281 landholders who would be directly impacted along the seven route segment options. To ensure AP could contact as many landholders as possible, AP contracted seven land service providers, one for each route segment, allowing AP to have up to 35 land agents readily available to meet directly with potentially directly affected landholders. In Q2 and Q3 of 2024, AP was able to contact 1,247 of these landholders and met in person with 1,198 (96%) of the 1,247 landholders. The information packages provided in these meetings included the project overview and the seven preliminary route segments, as well as information on the purpose of the PIP and its objective of gathering feedback from potentially directly affected landholders and identifying potential constraints within each route segment.

88. During the resulting consultation meetings with individual landholders, AP representatives documented each participant's concerns and feedback on the seven route segment options and provided or arranged to provide additional information when requested. In some cases, additional visits and/or follow-up calls were scheduled based on feedback from the initial consultation. During this process, AP also requested that landowners sign survey consent forms, which would allow AP to access and survey their respective parcels of land, and to complete technical or environmental work.

89. Additional information packages were also provided to any new potentially affected parties as they were identified whether through the open houses or upon specific requests from the public. Renters and other occupants whose interests were not registered on land titles were also included in the PIP when they became known. A sample of the information package is included in Attachment B2.

90. During this stage, AP engaged with the local and municipal authorities listed in Table 11 to obtain information and gather feedback on the preliminary routes:

Table 11: Early Engagement on Route Segments with Local and Municipal Authorities

Government Body	Date
Yellowhead County	September 17, 2024
Parkland County	July 31, 2024
Lac Ste. Anne County	September 3, 2024*
Strathcona County	August 8, 2024
Sturgeon County	August 20, 2024**
City of Edmonton	July 25, 2024
City of Fort Saskatchewan	August 8, 2024
City of St. Albert	October 16, 2024

* A second consultation took place June 5, 2025 with Lac Ste. Anne County due to changes in the local government staff, which required additional consultation to ensure all members were up-to-date and informed on the YP Project.

** AP did not provide a formal presentation to Sturgeon County. However, AP provided all the YP Project materials to the Mayor of Sturgeon County and received a letter of support shortly thereafter.

91. Local and municipal authorities have been very receptive to the YP Project due to its positive economic impact on the region, as well as Alberta as a whole. Both Sturgeon County and Strathcona County were extremely supportive of the YP Project and provided letters of support emphasizing how the YP Project would help ensure their competitive advantage and economic growth. These letters of support were included in the Need Application.⁸ AP also notes that, since providing its initial letter of support, Sturgeon County has continued to show active engagement and support for the YP Project, including through its role as a landowner on the Preferred Route of the YP Mainline.

92. Of all the local and municipal authorities within the study area, only the City of St. Albert has expressed concerns with the YP Project. The City of St. Albert's council expressed concerns related to the Central 2 (white) route segment that would have traversed northwest of the City of St. Albert and north of the City of Edmonton through lands designated for future residential subdivisions, thereby having the potential to impact the City of St. Albert's future growth plans. This was one of the main factors driving AP's decision to remove this route segment option from further consideration.

4.2.2 Open Houses

93. During engagement on the seven route segments, AP held open houses in 10 different locations between November 2024 and February 2025. Collectively, nearly 400 people attended these events. AP advertised the ten open houses by doorhangers, direct mail, webpage, social media, and newspaper advertisements to endeavour to ensure that individuals residing within a one-kilometer radius of the seven route segments would be aware of the open houses.

94. The objective of these open houses was to provide attendees with comprehensive information on the YP Project and to solicit their feedback and concerns. Each session was staffed with at least eight AP employees, along with contractor support as necessary,

⁸ Exhibit 29318-X0002, ATCO Pipelines Yellowhead Mainline Need Assessment Application, Attachment 7

to engage with attendees, address questions and concerns related to the YP Project, and document any issues or concerns individuals had regarding their land interests.

95. The open house locations were strategically chosen to ensure that each event was within a 20-minute drive for all potentially affected residences and within one km of the seven potential route segments, thereby facilitating community participation. Three open houses were scheduled between late November and early December 2024, with an additional seven between late January and early February 2025.

96. The three open houses in 2024 had relatively low attendance (53 people), which was likely due to Canada Post strike-related invitation delivery issues. To improve turnout for 2025, AP utilized land agents to distribute over 11,000 door hangers and promoted the events through radio and social media, ensuring a wider audience was made aware of the open houses. A sample of the door hanger is included in Attachment B3, and examples of the digital marketing for the open houses are included in Attachment B4. As a result, 334 people attended the January and early February 2025 open houses. For more information, regarding the open house locations, dates, and attendance, please refer to the Table 12 below.

Table 12: Open House Information for the Engagement on the Seven Potential Route Segments

Open House Location	Date	Number of Stakeholders who Attended
Niton Junction	November 28, 2024	3
Fallis	December 4, 2024	9
Onoway	December 10, 2024	41
Niton Junction	January 22, 2025	29
Namao	January 23, 2025	62
Onoway	January 27, 2025	90
Riviere Qui Barre	January 28, 2025	30
Fallis	January 29, 2025	43
Fort Saskatchewan	January 30, 2025	42
Muir Lake	February 6, 2025	45
Total		394

*Based on the open house sign-in sheet, therefore, it does not reflect parties who chose not to sign in.

97. Information about the YP Project was on display at each open house to help inform the public and encourage questions and interaction with the AP employees and representatives present. The following items were made available to stakeholders at each of the open houses. Please refer to Attachment B5 for examples of the displays and information presented at each of the open houses.

- Project Overview (display boards);
- About ATCO (display board);
- Aligning with Alberta's Natural Gas Vision and Strategy (display board); and
- Seven Potential Route Segment Maps (display board).

98. The feedback gathered to this point from the engagement undertaken, open house feedback cards, and emails sent to the YP Project email were taken into consideration as part of the selection of the preliminary preferred route. A project-specific email address was also established, allowing any landowner or interested party to provide comments on the project through this email address. The record of this engagement with landowners and interested parties is included in Appendix B.

99. Additionally, comment cards were made available to open house attendees. Information from comment cards received during open houses was reviewed by project staff and input into the consultation tracking database. This information was then used to help identify issues and concerns, as well as potential follow-up and site-specific opportunities for mitigation measures that could reduce project impacts. The consolidation of comment forms into the tracking database enabled AP to record the information gained from the comment forms in a meaningful and useful format, facilitating a more comprehensive comparison of the route segments. Both the frequency of concerns and objections, as well as the type of concern, were considered in combination with the standard routing criteria discussed in Section 3 above.

100. During the open houses, a total of forty-two comment cards were filled out by attendees. The majority of the comments (26) were considered either positive or neutral, with the comments focusing on the potential employment opportunities and the overall economic growth that Alberta would experience as a result of the YP Project. Attendees also commented positively on the quality of the open houses and the information they received about the project from AP staff.

101. The negative comments received at the open houses primarily related to the West 2 (green) segment. Attendees were generally opposed to the West 2 (green) segment due to its disruption of green spaces, especially since the West 1 (orange) segment follows a previously disturbed area, with significant existing pipeline infrastructure in this corridor, and would have a less significant environmental, landscape, and aesthetic impact than the West 2 (green) segment.

4.2.3 Findings from Early Engagement on the Seven Route Segments

102. The information received from the early engagement on the seven route segments, completed as part of the PIP, informed the selection of the preliminary preferred route. While the responses gathered from the public consultation program did not show a strong preference between the eastern segments, they did illustrate a clear preference between the western and central segment routing alternatives, as discussed below.

4.2.3.1 Western Route Segments

103. Based on the feedback received from the landowner in person meetings to obtain survey consent, open houses, phone calls, comment cards, and emails, the West 1 (orange) segment was clearly preferred by participants over the West 2 (green) segment. The strong preference for West 1 (orange) is driven by the fact that the majority of the West 1 (orange) segment follows an existing linear disturbance, the TMX, thereby maximizing the consolidation of infrastructure development in a common corridor. In contrast, the West 2 (green) segment does not follow any existing disturbances and would traverse relatively undisturbed areas. As a result, the West 2 (green) segment would have a larger environmental, landscape, and aesthetic impact than the West 1 (orange)

segment. In particular, participants in the various consultation processes expressed direct concern with impacts on flora and fauna in the area, and the ability for future generations to enjoy the pristine wilderness along the West 2 (green) segment.

104. In addition to the negative input to the West 2 (green) segment collected directly by AP during early engagement, landholders contacted CBC to publish a news article⁹ and also initiated an online petition¹⁰ to further express their opposition to the West 2 (green) segment.

4.2.3.2 Central Route Segments

105. The Central 1 (purple) segment is considered more favourable than the Central 2 (white) segment based on information received through the engagement on the two segments. Discussions at the open houses, feedback from landowner in person meetings to obtain survey consent, phone calls, comment cards, and emails illustrated a preference for the Central 1 (purple) segment. Feedback received at the open houses indicated a preference that the Central 2 (white) segment be avoided due to the proximity of residences in the rural subdivisions along this route segment. The Central 2 (white) segment was also deemed as less favorable due to the high number of directly affected landholders who refused to grant consent to survey during early engagement, approximately 22%, compared to 2% on Central 1 (purple). Additionally, the Central 2 (white) segment crossed lands within the City of St. Albert that are planned for future development.

4.2.3.3 Eastern Route Segments

106. Based on the feedback received from open houses, landowner in person meetings to obtain survey consent, emails, comment cards, and phone calls on the East 1 (red), East 2 (yellow), and East 3 (blue) segments, there were no material differences between East 1 (red) and East 3 (blue). East 2 (yellow) received less support at this stage because

⁹ Sarah Reid, Rural Alberta Landowners Push Back Over Proposed Route for ATCO Gas Pipeline, CBC News, Feb 15, 2025, <https://www.cbc.ca/news/canada/edmonton/opposition-to-pipeline-route-1.7459994>

¹⁰ Steven Bell, Oppose the Construction of the ATCO Yellowhead Mainline Pipeline, Change.Org, <https://www.change.org/p/oppose-the-construction-of-the-atco-yellowhead-mainline-pipeline>

this proposed route passes through existing subdivided commercial parcels. Therefore, East 2 (yellow) was graded lower than East 1 (red) and East 3 (blue) in this category. Please refer to Section 3.4.3 for details regarding AP's selection of the East 1 (red) segment over the East 3 (blue) segment in determining the preliminary preferred route.

4.3 Stage 2 - Engagement on the Preliminary Preferred Route

107. The objective of AP's engagement on the preliminary preferred route was to provide stakeholders with information about the preliminary preferred route, to collect feedback from landowners regarding potential concerns and any necessary mitigations, and to conduct formal notification, personal consultation, and confirmation of non-objection, ultimately including the refinements to the preliminary preferred route and the resulting Preferred Route.

4.3.1 Notification and Consultation

108. Once the preliminary preferred route had been selected, based on the information gathered from the PIP by that point and the routing criteria discussed in Section 3 above, AP conducted personal consultation with occupants, residents, landowners, First Nation reserves, and Metis Settlements within or directly adjacent to the pipeline right-of-way of the preliminary preferred route, and ultimately the Preferred Route, and those who requested consultation after receiving notification (or otherwise conveyed objections). In addition, AP conducted personal consultation with occupants, residents, landowners, First Nation reserves, and Metis Settlements within 0.5 km of the YP Compressor Station site boundary. AP also provided notifications to Crown disposition holders, local authorities along the right-of-way and urban authorities within 1.5 km of the of the preliminary preferred route, and ultimately the Preferred Route, and further provided notifications to occupants, residents, landowners, First Nation reserves, and Metis Settlements within 0.2 km. AP also provided notifications to Crown disposition holders, local authorities and occupants, residents, landowners, First Nation reserves, and Metis Settlements within 1.5 km of the YP Compressor Station site boundary. Confirmations of non-objection were received from occupants, residents, landowners, First Nation reserves, and Metis Settlements within the pipeline right-of-way of the preliminary

preferred route and ultimately the Preferred Route, and those adjacent to the YP Compressor Station site boundary.

109. Using available databases and knowledge of the YP Project area, AP notified all other Crown disposition holders, oil and gas mineral owners, and pipeline licensees that may be directly and adversely affected. There are no outstanding objections from such parties as of the date of filing of this Application.

110. A sample of the information package provided to each stakeholder during the consultation and notification process has been included in Attachment B2. This package provided information regarding the preliminary preferred route and information on how to contact AP regarding the YP Project (website, phone, fax, e-mail, and mailing address). This information was also readily available on the YP Project website, allowing individuals interested in the project to access it and further participate in the process. The documentation in the package included:

- project letter;
- Attachment A – Project Details;
- a brochure on the YP Project;
- project timeline;
- a map showing the centerline of the preliminary preferred route;
- Participating in the AUC's independent review process to consider facility applications" brochure;
- Confirmation of Non-objection (where applicable); and
- Individual ownership plan showing project footprint for the directly affected landholders parcel (where applicable).

4.3.2 Open Houses

111. As part of the AP's engagement on the preliminary preferred route, AP sent notices regarding six open houses to landholders residing within 1 km of the preliminary preferred

route. Landowners along the preliminary preferred route received tailored invitations, while those within 1 km of that route received a more general invitation. Invitations to the open houses were also advertised through radio, local newspapers, and geo-targeted advertisements, as well as through posters placed in high-traffic locations, such as gas stations, halls, and libraries. Each of the advertisements highlighted the upcoming open houses, high-level details of the YP Project, and encouraged individuals to review the YP Project website (yellowhead.atco.com) for further details on the open houses and the YP Project. Advertising for the open houses is summarized in Figure 7 as follows:

Figure 7: Open House Advertisements

May-25													Jun-25															
20	21	22	23	24	25	26	27	28	29	30	31	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Digital / Audio Advertisements																												
Stingray - CFCW Radio						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X								
Digital Display Ads						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Community Newspapers																												
Fort Saskatchewan Record			X																									
Stony Plain Reporter				X																								
The Weekly Anchor							X																					
Lac Ste. Anne Bulletin							X																					
St. Albert Gazette			X																									

112. The purpose of the open houses was to provide attendees with an opportunity to ask questions about the YP Project and express their concerns, if any, regarding the preliminary preferred route. Each open house was attended by a minimum of eight AP employees plus contractor support as needed, to speak with attendees and respond to their questions and concerns regarding the YP Project, and to document details of potential concerns specific to the attendees' interests.

113. Similar to AP's first round of open houses regarding the seven potential route segments, the locations for the open houses were selected to ensure that an open house was available within a 20-minute drive from any potentially affected residence or business within 1 km of the preliminary preferred route, thereby encouraging as much engagement as possible. Feedback from the open houses was collected through comment cards.

114. Between June 9, 2025, and June 18, 2025, AP held six open houses, with approximately 187 people attending these sessions. Please refer to Table 13 below for detailed information about the open houses.

Table 13: Open House Information for Preliminary Preferred Route

Open House Location	Date	Number of Stakeholders who Attended
Niton Junction	June 9, 2025	12
Fallis	June 10, 2025	27
Onoway	June 12, 2025	48
Fort Saskatchewan	June 16, 2025	27
Calahoo	June 17, 2025	27
Morinville	June 19, 2025	49
Total		190

115. Information about the YP Project was on display at each open house, to inform the public and encourage questions and interaction with the AP employees present. The following items were made available to attendees at each of the open houses.

- Project Overview (display boards);
- About ATCO (display board);
- Aligning with Alberta's Natural Gas Vision and Strategy (display board); and
- Project Preliminary Preferred Route Map (display board).

116. Please refer to Attachment B5 for examples of the displays and information presented at each of the open houses.

117. Consistent with the first set of open houses, information from comment cards received during open houses was reviewed by AP staff and input into the consultation tracking database. This information was used to help refine issues and concerns, as well as potential follow-up and site-specific opportunities for mitigation measures that could reduce project impacts.

118. A total of six comment cards were filled out by attendees at the open houses for the preliminary preferred route. The majority of the comments were considered either positive or neutral.

4.4 Stage 3 - Ongoing Resolution of Concerns

119. AP is committed to continuing to address stakeholder concerns throughout the life of the YP Project, including reclamation of the RoW following construction of the YP Mainline, and will continue to maintain and monitor the project-specific email address during this time. Land agents will also be available during construction to address any stakeholder concerns that may arise, such as concerns regarding noise or traffic. A database will also be developed to keep track of any reclamation concerns from stakeholders, such as soil slumping, to ensure these concerns are addressed during the reclamation and in-service phases of the YP Project.

120. During the PIP, AP endeavoured to respond to all outstanding questions and concerns regarding the YP Project. Where participant concerns were not directly related to the location of the route, AP provided additional information in an effort to alleviate the concern. This included providing verbal responses, distributing printed and digital materials, and engaging with participants through their preferred means of communication when possible.

121. In addition to conducting information-sharing activities, AP also conducted follow-up meetings with landholders along the RoW prior to filing this Application in an effort to address and resolve any outstanding concerns. These follow-up consultations included meetings with YP Project planners or specialists and were conducted in person, by phone, or through e-mail correspondence, based on the preference of the participant.

122. While AP endeavoured to respond to all outstanding concerns, some stakeholders have unresolved concerns. Please refer to Attachment B9 A and B for a list of these concerns and any related material.

4.5 Summary of Participant Involvement Program

123. This section summarizes the results of the PIP, including AP's overall findings and conclusions in respect of provincial governmental agencies, landholders, industry, local and municipal authorities, Indigenous groups, and other interested parties. Information included in this section is current as at November 2, 2025; however, AP has and will continue to consult with stakeholders to mitigate potential concerns where reasonably practical.

4.5.1 Provincial Governmental Agencies

124. AP notified and consulted with all provincial governmental agencies identified as stakeholders in accordance with AUC Rule 007. AP's engagement with many of these government agencies began in Q3 of 2024, through meetings to introduce the YP Project and to determine potential planning constraints to be considered during the identification and assessment of routing segments and development of the preliminary preferred route.

125. Following the determination of the preliminary preferred route, AP undertook additional consultations with provincial governmental agencies through phone calls and/or email to review and receive further feedback on the YP Project. AP met with a number of agencies, where requested, to provide additional clarity or information to help resolve any specific concerns regarding the preliminary preferred route.

4.5.2 Local and Municipal Authorities

126. Municipal Authorities provided valuable information regarding regional and site-specific development constraints that influenced AP's routing process. For instance, local land use and zoning considerations ruled out the concept of routing through the TUC around north Edmonton due to conflicts with the City of St. Albert's future development plans in the area.

4.5.3 Federal Governmental Agencies

127. Consultation with the federal agencies included an overview of the preliminary preferred route; however, topics were primarily focused on resolving more site-specific requirements, such as permits and construction mitigation concerns.

128. AP consulted with Fisheries and Oceans Canada (DFO) on July 15, 2025, to review the proposed watercourse crossings along the preliminary preferred route and mitigation measures AP has proposed to reduce potential impacts to fish and fish habitat at these crossings.

129. AP consulted with Environment and Climate Change Canada (ECCC) on September 15, 2025, to review proposed mitigation measures as they relate to federally listed birds and wildlife.

4.5.4 Private Landholders

130. In accordance with Rule 007, AP notified and consulted with private landholders identified through the PIP, as described in sections 3 and 4. Consultations with private landholders began in Q2 of 2024, and will remain ongoing throughout the life of the YP Project.

131. Input from private landholders was used to refine the route options to reduce overall potential impacts. Some routes and facility locations were removed from consideration based on discussions with landholders. For instance, engagement with landholders regarding the West 2 (green) segment and the Central 2 (white) segment resulted in the elimination of those potential route segments from further consideration for the Preferred Route. In other locations, the engagement on the seven potential route segments and the preliminary preferred route resulted in route modifications in response to feedback from interested parties.

132. Various landowners expressed common concerns regarding the YP Project. AP responded to these concerns during one-on-one consultations and distributed brochures which answered frequently asked questions (see Attachment B2) to address these

concerns in a clear and consistent manner. Responses to additional concerns that were not addressed in the YP Project materials were provided through follow-up one-on-one communications, and additional information was made available wherever possible. Please refer to Attachment B6 (A-E), for the results of the consultation with landowners. Due to the volume of stakeholders consulted as part of the PIP, the results are summarized at a high level of issues and concerns for each stakeholder, with a brief description of AP's response to the concern.

4.5.5 Industry

133. Potentially affected industrial stakeholders were notified and consulted in respect of the YP Project in accordance with AUC Rule 007. These stakeholders were primarily gravel and mineral extraction companies, as well as electric, gas, or water distribution utilities. Most industrial stakeholders indicated that they had no concerns with the YP Project and were generally supportive of it. Discussions mainly focused on ensuring that AP would execute the necessary third-party crossing, proximity and/or encroachment agreements as per standard industry practice prior to construction of the YP Project.

134. Input received from industrial stakeholders was used to refine the route options to reduce any potential impacts on them. Such input was incorporated into route development as follows:

- AP would avoid intersecting active wellheads and associated infrastructure and endeavoured to minimize RoW overlap to reduce potential operational restrictions at these sites;
- AP would ensure the route placement would avoid or minimize impacts to current or planned future mineral extraction operations; and
- AP would compensate Forest Management Agreement (FMA) holders through the Timber Damage Assessment process for any withdrawal of area from the productive FMA land base that was required for the YP Project.

4.6 Participant Involvement Program for Indigenous Groups

135. AP respects the rights of Indigenous groups and holds in high regard the relationships it has developed, and continues to develop, with Indigenous groups in the

areas where AP operates. AP endeavors to consult appropriately and meaningfully with all Indigenous groups that are potentially impacted by its projects and recognizes Indigenous consultation as an ongoing commitment throughout the life of the project.

136. AP's PIP for Indigenous groups was undertaken in compliance with the requirements of Rule 007, Appendix A1-B – Participant Involvement Program Guidelines for Indigenous Groups. The engagement process undertaken by AP for Indigenous groups, in addition to the activities outlined in sections 4.2 to 4.5 of this Application, is described below.

137. AP's Indigenous PIP for the YP Project consisted of the following three general stages:

- Early engagement on the seven potential route segments;
- Engagement on Preliminary preferred route; and
- Ongoing consultation.

138. The timing and a general description of the activities comprising AP's Indigenous PIP are outlined in Table 14 below.

Table 14: Key AP Indigenous PIP Activities

Timing	Activity/Milestone
Q4 2024 to Q1 2025	Early engagement on seven potential route segments – Early discussions with the Aboriginal Consultation Office (ACO) and establishing relationships with the Indigenous groups' respective consultation offices. Consultation with nine of the 14 Indigenous groups that were identified using the Landscape Analysis Indigenous Relations Tool (LAIRT) and by AP in respect of AP's Preliminary Routes.
Q2 2025 to Q4 2025	Engagement on preliminary preferred route – Consultation with 14 Indigenous groups that were identified by the ACO and AP, as well as additional Indigenous groups that requested engagement from AP, ultimately resulting in the development of, and including the consultation for, the Preferred Route.
Ongoing	Ongoing Consultation – Consultations to resolve outstanding issues will continue throughout the YP Project's duration.

4.6.1 Early Engagement on the Seven Potential Route Segments

139. In developing the Indigenous PIP, AP utilized the Alberta Government Landscape Analysis Indigenous Relations Tool (LAIRT) to help determine which Indigenous groups would require consultation in relation to the YP Project. The following groups were identified:

- Alexander First Nation;
- Alexis Nakota Sioux Nation;
- Enoch Cree Nation No. 440;
- Kehewin Cree Nation;
- Louis Bull Tribe;
- Montana First Nation;
- O'Chiese First Nation;
- Paul First Nation;

- Buffalo Lake Métis Settlement;
- Kikino Métis Settlement; and
- Lac Ste. Anne Métis Community.

140. In addition to those Indigenous groups initially identified by the LAIRT, AP included the following 3 groups based on existing knowledge of working in the area:

- Ermineskin Cree Nation;
- Samson Cree Nation; and
- Sunchild First Nation.

141. Following the development of the initial list of 14 Indigenous groups and identification of the seven potential route segments, AP's Indigenous Relations and Land teams began to reach out to each Indigenous group's respective consultation office to begin early discussions. AP initiated engagement with several Indigenous groups to present information and receive feedback on the route segments. AP held meetings with 9 of the Indigenous groups identified by either the LAIRT or AP during early engagement processes between Q4 2024 and Q1 2025, being those groups which responded to indicate an interest in engaging at that stage.

142. Consultations with the Indigenous groups varied, but generally included project details, the overall need for YP, an overview of the seven route segments, training, employment and possible procurement opportunities, as well as information on the purpose of the PIP and AP's commitment to consultation throughout the life cycle of the project. Additionally, these early consultation meetings allowed AP to gather feedback on the seven route segments which were incorporated into the project development and determination of the preliminary preferred route.

143. As described in Section 4 of this Application, AP had various forms of notification for the ten open houses that it was hosting as part of the PIP. Some individual members of Indigenous groups attended these open houses to engage with AP, which not only

enabled AP to provide further consultation to their respective groups, but also helped identify additional opportunities within the various communities.

4.6.2 Engagement on Preliminary Preferred Route

144. Once the preliminary preferred route was selected, AP undertook further engagement and consultation with the above-mentioned Indigenous groups to update them on the selection of the preliminary preferred route and to receive additional feedback and/or concerns on that route through the ACO process. In Q1 2025, AP applied for approval from the ACO for the YP Project and guidance regarding delegated consultation with Indigenous groups. The ACO identified the following 11 Indigenous groups and the specific areas for each group for consultation in respect of related approvals on Crown lands:

- Alexander First Nation;
- Alexis Nakota Sioux Nation;
- Enoch Cree Nation No. 440;
- Kehewin Cree Nation;
- Louis Bull Tribe;
- Montana First Nation;
- O'Chiese First Nation;
- Paul First Nation;
- Buffalo Lake Métis Settlement;
- Kikino Métis Settlement; and
- Lac Ste. Anne Métis Community;

145. Similar to the consultation on the seven route segments, the level of consultation with each of the Indigenous groups in relation to the preliminary preferred route varied, depending on the level of consultation the ACO directed at that time. During these consultations, AP provided updated project information, including detailed information on

the preliminary preferred route, along with completing site visits (76) with the 11 groups identified by the ACO. Each group's Consultation office was contacted and various community members from Environmental monitors, Traditional knowledge keepers and in some cases Community Leaders participated in the consultation process to determine if the preliminary preferred route raised traditional land use concerns, and if so, to identify any potential avoidance and/or mitigation measures. Information shared by the Indigenous groups at this stage was incorporated into project development and informed the refinement of the applied for Preferred Route to mitigate any concerns wherever possible. The consultation completed during this stage also included the Preferred Route as route refinement was completed throughout the Crown Land Areas.

146. During the consultation process, additional groups have come forward requesting to be included on the YP Project consultation process. AP has been working with all additional groups (i.e. any groups not identified by the ACO and areas not identified by the ACO for groups who were identified by the ACO) in a format similar to the ACO process which is being referred to as the Consultation Plus process, tailored to meet each group's specific requests. AP also initially included the same 3 additional Indigenous groups identified during early engagement in the Consultation Plus process:

- Ermineskin Cree Nation;
- Samson Cree Nation; and
- Sunchild First Nation.

The additional 8 groups that have shown interest and were later added to the Consultation Plus program are:

- Asini Wachi Nation;
- Friends of Michel Society;
- Stoney Nakoda – Bearspaw First Nation;
- Stoney Nakoda – Chiniki First Nation;
- Stoney Nakoda – Goodstoney First Nation;

- Saddle Lake Cree Nation;
- Fishing Lake Metis Settlement; and
- Whitefish Lake First Nation #128.

147. In addition to specific discussions on the YP Project Preferred Route and site visits, the consultation with the Indigenous groups also included discussions regarding other engagement measures, such as education, employment and potential procurement opportunities related to the YP Project. Further to the ACO requirements, AP has included all the ACO identified groups in the Consultation Plus program, which provides the opportunity to complete site visits and provide feedback on any impacts to Traditional Land Use activities on all crown land areas affected by the project footprint.

4.6.3 Ongoing Consultation

148. AP is committed to an open and transparent consultation process throughout the duration of the YP Project. AP will continue to utilize the Indigenous Relations and Land teams to ensure that each Indigenous group's consultation protocol is followed, and to ensure that AP engages in appropriate consultation with each group if additional requests for consultation arise during the YP Project's life cycle. As the YP Project progresses, Indigenous groups requesting engagement will be continually informed of any changes to the project plans as new information becomes available. Indigenous groups will also be notified of the construction schedule and details prior to commencement of construction, and will be offered monitoring positions on the crown land areas of the project during construction activities, including review of the areas post construction and after reclamation has been completed.

4.6.4 Summary of Indigenous Groups Consulted

149. As discussed above, AP consulted with additional Indigenous groups beyond those originally identified by the ACO. At the time of filling this Application, AP is undertaking ongoing consultation with 22 Indigenous groups that have been identified by the ACO or have come forward requesting consultation; refer to Attachment B7 C for

further details. AP remains open to engagement with all Indigenous groups if and when they wish to engage with AP with regards to the YP project.

150. At the time of the filing of this Application, AP has determinations of consultation adequacy from the ACO in respect of all 11 Indigenous groups identified by the ACO. Please refer to Attachment B7 (A-C) for the adequacy determinations received from the ACO, a list of ACO mitigations, and a summary of the overall ACO Engagement.

151. Additional Indigenous groups may be added for consultation upon request as the YP Project progresses.

152. The current list of 22 Indigenous groups identified for consultation are as follows:

ACO Identified Consultation

- Alexander First Nation;
- Alexis Nakota Sioux Nation;
- Enoch Cree Nation No. 440;
- Kehewin Cree Nation;
- Louis Bull Tribe;
- Montana First Nation;
- O'Chiese First Nation;
- Paul First Nation;
- Buffalo Lake Métis Settlement;
- Kikino Métis Settlement; and
- Lac Ste. Anne Métis Community.

Consultation Plus Program

- Ermineskin Cree Nation;

- Samson Cree Nation;
- Sunchild First Nation;
- Stoney Nakoda - Bearspaw First Nation;
- Stoney Nakoda Chiniki First Nation;
- Stoney Nakoda Goodstoney First Nation;
- Saddle Lake Cree Nation;
- Whitefish Lake (Goodfish) First Nation;
- Friends of Michel Society;
- Asini Wachi Nation; and
- Fishing Lake Métis.

4.6.5 Benefits to Indigenous Groups

153. Given AP's high regard for Indigenous groups and the relationships it has developed with Indigenous groups in the areas in which it operates, AP strives to go beyond the mandatory engagement activities outlined in Rule 007 by providing additional opportunities and benefits to Indigenous groups across all of its projects. This includes providing career opportunities for Indigenous group members through programs like the ATCO Indigenous Scholarship program and the pipeline inspector training program. These initiatives help Indigenous group members build lifelong skills that they can use not only during their time working with AP, but also to foster and build skill sets that can be easily transferred to other work opportunities, helping them realize their future career endeavours.

154. The YP Project, in particular, will provide significant opportunities given its longer-than-typical project timeline and the pipeline's location in the vicinity of several Indigenous groups. These opportunities will not only foster the economic development of the communities but also enhance their long-term prosperity and self-sufficiency

4.7 Conclusion on PIP

155. AP is of the view that the PIP is a critical part of the project planning and development process. Through meaningful discussions with numerous groups, AP gathered valuable feedback on the YP Project and addressed many of the participants' concerns. Feedback from participants was carefully reviewed, and while certain concerns remain, AP was able to address many of the participants' concerns through information sharing and incorporation of feedback into the YP Project design and planning. AP remains committed to continuing open and transparent consultation throughout the YP Project and will continue to endeavour to resolve any outstanding concerns.

156. As of November 2, 2025, AP has consulted with all 735 directly affected landowners and occupants and has received 638 confirmation of non-objection letters which represents confirmation of non-objection from 87% of those landowners and occupants.

Table 15: Summary of Confirmation of Non-Objection Status

	Count
Non-Objections Required	735
Non-Objections Received	638
Non-Objections Outstanding	97

Note: These figures do not include confirmation of non-objections that would be required from government agencies and railroad companies given that their policy is to not provide confirmation of non-objection in respect of energy projects, but do include confirmation of non-objections required from occupants of lands owned or administered by those government agencies and railroad companies.

157. Please refer to Attachment B8 for a sample non-objection letter and Attachments B9 (A-B) for a list of current objections to the YP Project. A list of mailing/contact information for all individuals who were contacted during the Preferred Route public notification process will be physically mailed to the Commission separately.

SECTION 5: ENVIRONMENTAL CONSIDERATIONS AND OTHER APPLICABLE REGULATIONS

5.1 Overview

158. This section outlines the process by which AP considered and applied the information collected during the development phase of the YP Project in order to satisfy all regulatory requirements in respect of the Preferred Route of the YP Project. Such regulatory requirements applicable to the YP Project will include those requirements specifically identified in AUC Rule 007, the *Environmental Protection and Enhancement Act* (EPEA), the *Water Act*, the *Public Lands Act* (PLA), the *Highway Development and Protection Act*, and the *Wildlife Act*; as well as any other applicable regulatory requirements.

5.2 Environmental Impact

159. AP is committed to constructing and maintaining the YP Project adhering to the Alberta Government's Environmental Protection Guideline for Pipelines, and in accordance with relevant legislation and regulations, and the terms and conditions of the applicable RoW or surface lease agreements, and regulatory approvals.

160. As part of the pre-FEED environmental review, AP retained Jacobs Consultancy Canada Inc. (Jacobs) to prepare a Desktop Environmental Routing Report. The scope of this report was to identify and compare key environmental features within 100 m of the proposed pipeline centerline for each of the preliminary route segments. At the time of the report issuance, the Central 2 (white) segment was removed from consideration (please refer to sections 3 and 4 for additional information). This report included a desktop review of publicly available records or known occurrences of the following:

- Overlap with sensitive or restricted environmental areas, including potential presence of wildlife species at risk and sensitive species ranges (Table 16);
- Distance parallel to existing disturbance, including existing pipeline RoWs (Table 17);
- Intersection with parks and protected areas (Table 18);

- Potential interaction with known historical resources or Historic Resource Value (HRV) lands (Table 19);
- Waterbody features within the proposed pipeline corridor, including wetlands, watercourses and potential drainages, and the potential for aquatic species at risk (Table 20 and Table 21); and
- Overlap with clubroot positive municipalities and tracked populations of high-density weeds and rare plants (Table 22).

Table 16: Sensitive or Restricted Areas

Consideration	West Orange	West Green	Central Purple	East Red	East Yellow	East Blue
Migratory Bird Nesting Zone B4	All suitable habitat (not cultivated)	All suitable habitat (not cultivated)	All suitable habitat (not cultivated)	All suitable habitat (not cultivated)	All suitable habitat (not cultivated)	All suitable habitat (not cultivated)
Migratory Bird Nesting Zone B5	All suitable habitat (not cultivated)	All suitable habitat (not cultivated)	None (segment does not overlap this zone)	None (segment does not overlap this zone)	None (segment does not overlap this zone)	None (segment does not overlap this zone)
Key Wildlife Biodiversity Zone	0%	4.14%	0%	6.56% of route	2.47% of route	3.46% of route
Sharp-tailed Grouse Range	0%	0%	9.32% estimated suitable habitat (56.20% of route is within the Range)	17.58% estimated suitable habitat (90.03% of route is within the Range)	17.67% estimated suitable habitat (100% of route is within the Range)	23.53% estimated suitable habitat (100% of route is within the Range)
Sensitive Raptor Range	0%	0%	13.31% estimated suitable habitat (56.20% of route is within the Range)	13.19% estimated suitable habitat (90.03% of route is within the Range)	9.46% estimated suitable habitat (100% of route is within the Range)	10.78% estimated suitable habitat (100% of route is within the Range)
Species at Risk Act species count	15	15	17	16	16	16
White Area	2397.12 Ha (98.73% of footprint)	2092.08 Ha (90.34% of footprint)	1204.19 Ha (100% of footprint)	727.77 Ha (100% of footprint)	637.20 Ha (100% of footprint)	409.94 Ha (100% of footprint)
Green Area	30.88 Ha (1.27% of footprint)	223.80 Ha (9.66% of footprint)	0 Ha (0% of footprint)	0 Ha (0% of footprint)	0 Ha (0% of footprint)	0 Ha (0% of footprint)

Table 17: Parallel to Existing Disturbance

Consideration	West Orange	West Green	Central Purple	East Red	East Yellow	East Blue
Distance	119.95 km (98.81% of footprint)	7 km (6.05% of footprint)	53.97 km (89.83% of footprint)	36.43 km (100% of footprint)	21.39 km (67.39% of footprint)	20.41 km (100% of footprint)

Table 18: Parks and Protected Areas

Consideration	West Orange	West Green	Central Purple	East Red	East Yellow	East Blue
National Parks	0 km	0 km	0 km	0 km	0 km	0 km
Provincial Parks	0 km	0 km	0 km	0 km	0 km	0 km
Municipal Parks/Recreation Areas	0 km	0 km	0 km	0 km	0 km	0 km

Table 19: Historical Resources

Consideration	West Orange	West Green	Central Purple	East Red	East Yellow	East Blue
Archaeological sites intersected	6 HRV 0 arky ¹ sites 1 HRV 4, TLU site	None	2 HRV 0 arky sites	3 HRV 4 arky sites 13 HRV 0 arky sites	None	1 HRV 4 arky site 8 HRV 0 arky sites 1 HRV 4 palaeo ² site
Archaeological sites within 500m	13 HRV 0 arky sites	1 HRV 4 arky site 1 HRV 0 arky site	4 HRV 0 arky sites	3 HRV 4 arky site 21 HRV 0 arky sites	1 HRV 0 arky site 1 additional arky site pending HRV	20 HRV 0 arky sites
HRV lands intersected	1.21 km of HRV 4c 2.4 km of HRV 5a 1.23 km of HRV 5p	1.76 km HRV 5a 0.54 km HRV 5p	None	2.07 km of HRV 4a 6.08 km of HRV 5a 0.11 km of HRV 5p	4.4 km of HRV 5a	0.39 km of HRV 4a 0.44 km of HRV 4p 2.09 km of HRV 5a 0.51 km of HRV 5p
Previous HRIA intersecting footprint	20 HRIAs	11 HRIAs ³	11 HRIAs	57 HRIAs	31 HRIAs	32 HRIAs

¹ Refers to an archaeological site

² Refers to a paleontological site

³ Majority of HRIAs intersect western end and parallel West Orange Segment.

Table 20: Wetlands

Consideration	West Orange	West Green	Central Purple	East Red	East Yellow	East Blue
Number of Marshes and Shallow Open Water Wetlands identified within the corridor	221	197	267	141	211	97
Number of Semi-permanent Marshes and Shallow Open Water Wetlands identified within the corridor	37	36	45	11	4	11
Total Wetlands Encountered by the corridor	416	390	300	151	223	110
% of the corridor area (ha) that intersects with wetlands	19.7%	23.0%	12.7%	14.9%	9.9%	13.6%

Consideration	West Orange	West Green	Central Purple	East Red	East Yellow	East Blue
Total Wetland Area Impacted by the corridor	478.5 ha	532.8 ha	153.3 ha	108.7 ha	63.2 ha	55.9 ha

Table 21: Watercourse Crossings

Consideration	West Orange	West Green	Central Purple	East Red	East Yellow	East Blue
Potential Drainages (agricultural, non-classified drainages, non-valued component) of Strahler Order 1 or TBD	30	40	26	4	3	0
Watercourse Crossings of Strahler Order 1-3 or TBD with COP Class C	68	60	20	8	11	10
Water bodies (lakes, ponds, dugouts)	16	5	12	1	13	1
Watercourse Crossings of Strahler Order 4 or 5	3	12	1	0	1	0
Major Watercourse Crossings (Strahler Order 6+)	1	1	5	1	1	0
Class A Watercourse Crossings	0	0	0	0	0	1
Alberta Special Species	Athabasca Rainbow Trout (Threatened) - 13 potential watercourses Arctic Grayling (Special Concern) - 3 watercourses Bull Trout (Threatened) - Pembina River, 13 potential watercourses	Athabasca Rainbow Trout (Threatened) - 9 potential watercourses Arctic Grayling (Special Concern) - 3 watercourses Bull Trout (Threatened) - Pembina River, 9 potential watercourses	None	Arctic Grayling (Special Concern) – 1 confirmed watercourse (North Saskatchewan River) Bull Trout (Threatened) - 1 confirmed watercourse (North Saskatchewan River) Lake Sturgeon (Threatened) - 1 confirmed watercourse (North Saskatchewan River)	Arctic Grayling (Special Concern) – 1 confirmed watercourse (North Saskatchewan River) Bull Trout (Threatened) – 1 confirmed watercourse (North Saskatchewan River) Lake Sturgeon (Threatened) – 1 confirmed watercourse (North Saskatchewan River)	Arctic Grayling (Special Concern) – 1 confirmed watercourse (North Saskatchewan River) Bull Trout (Threatened) – 1 confirmed watercourse (North Saskatchewan River) Lake Sturgeon (Threatened) – 1 confirmed watercourse (North Saskatchewan River)
Species at Risk Act Species	Athabasca Rainbow Trout (Endangered) potentially present in up to 13 watercourses	Athabasca Rainbow Trout (Endangered) potentially present in up to 9 watercourses	None	None	None	None

Consideration	West Orange	West Green	Central Purple	East Red	East Yellow	East Blue
Scheduled Navigable Waters	None	None	None	Minor Works Notice - North Saskatchewan River	Minor Works Notice - North Saskatchewan River	Minor Works Notice - North Saskatchewan River
Non-Scheduled Navigable Waters	Minor Works Notice - Carrot Creek, Lobstick River, Pembina River, and WBID 24393	Minor Works Notice - Carrot Creek, Deep Creek, Pembina River, Poison Creek, and Sturgeon River	Minor Works Notice - Riviere Qui Barre, Salter's Lake, Sturgeon River	None	None	None

Table 22: Clubroot, Weeds, and Vegetation

Consideration	West Orange	West Green	Central Purple	East Red	East Yellow	East Blue
Clubroot	4.02 km confirmed positive by County test results (5 quarters - 3% of footprint) 75.8 km confirmed positive including Yellowhead County's request to treat all cultivated land as positive (61% of footprint)	1.61 km confirmed positive by County test results (2 quarters - 1% of footprint) 78.86 km confirmed positive including Yellowhead County's request to treat all cultivated land as positive (68% of footprint)	4.83 km confirmed positive by County test results (6 quarters - 8% of footprint) 25.7 km confirmed positive including Sturgeon County's request to treat all cultivated land as positive (69% of footprint)	2.41 km confirmed positive by County test results (3 quarters - 7% of footprint) 26.55 km confirmed positive including Sturgeon County's request to treat all cultivated land as positive (75% of footprint) East 1 Alt 1 Route Concept had 5 positive quarters East 1 Alt 2 Route Concept had 4 positive quarters	2.41 km confirmed positive by County test results (3 quarters - 8% of footprint) 12.31 km confirmed positive including Sturgeon County's request to treat all cultivated land as positive (39% of footprint) East 2 Alt 1 Route Concept has 5 positive quarters	0 km confirmed positive by County test results (0 quarters - 0% of footprint) 4.12 km confirmed positive including Sturgeon County's request to treat all cultivated land as positive (19% of footprint)
Weeds	No known tracked weed populations	No known tracked weed populations	No known tracked weed populations	No known tracked weed populations, N/A – Strathcona County has elevated absinthine wormwood (<i>Artemisia absinthium</i>) as noxious under Bylaw 18-2018	No known tracked weed populations, N/A – Strathcona County has elevated absinthine wormwood (<i>Artemisia absinthium</i>) as noxious under Bylaw 18-2018	No known tracked weed populations, N/A – Strathcona County has elevated absinthine wormwood (<i>Artemisia absinthium</i>) as noxious under Bylaw 18-2018
Rare Plants	12 tracked populations	1 tracked population	14 tracked populations	2 tracked populations	114 tracked populations	1 tracked population
Species at Risk Act Plants	0 tracked populations	0 tracked populations	0 tracked populations	0 tracked populations	0 tracked populations	0 tracked populations
COSEWIC¹ Plants	0 tracked populations	0 tracked populations	0 tracked populations	0 tracked populations	0 tracked populations	0 tracked populations

¹ Committee on the Status of Endangered Wildlife in Canada

161. Neither a federal impact assessment nor a provincial environmental impact assessment is required in respect of the YP Project. AP engaged a third-party consultant, Montrose Environmental Solutions Canada Inc. (Montrose), to prepare an Environmental Evaluation (EE) in respect of the final Preferred Route that contains the information specified under AUC Rule 007. AP also engaged Montrose to develop two Environmental Protection Plans (EPPs) that outline the specific mitigation measures and monitoring activities AP is committed to implementing during the construction and operation of the YP Project (one EPP for the YP Mainline and one EPP for the associated YP Facilities). The EE (Appendix C) and EPPs (Attachments D1 and D2) provide the level of detail required to satisfy the AUC Rule 007 requirements regarding the environmental impacts of the YP Project.

162. The EE describes the existing environmental conditions along the final Preferred Route and identifies the components of the environment that may be potentially affected by the YP Project, as well as an assessment of the significance of such impact and the mitigation measures and monitoring activities proposed by AP. Specifically, the EE provides the following as it relates to the final Preferred Route and associated facilities:

- Pre-project environmental and land use conditions in the “local study area” as defined by the valued components (VCs) identified in the EE (i.e., environmental and cultural resources or features that are of public concern, important to landowners and stakeholders, protected by legislation, and that could be directly or indirectly affected by the YP Project – see section 4.1 of the EE);
- Identification and description of project activities and infrastructure that may adversely affect the environment, including potential adverse effects on the following identified VCs: soils, terrain, vegetation species and communities, wetlands, wildlife species and habitat, surface water quality, hydrology, aquatic species and habitat, groundwater, historical and paleontological resources, land use, and environmentally significant areas (ESAs);
- The methodology used to identify, evaluate, and rate any adverse environmental effects and determine their significance, along with an explanation of the scientific rationale for choosing the methodology;
- The mitigation measures and monitoring activities that AP proposes to implement during the life of the YP Project to reduce any potential adverse effects and to verify the effectiveness of the proposed mitigation measures;

- Descriptions of the predicted residual adverse effects of the YP Project and their significance after implementation of the proposed mitigation measures;
- Qualifications of Montrose personnel and all other individuals who conducted or oversaw the EE;
- An overall review of the VCs potentially impacted by the final Preferred Route;
- A summary of the compatibility of the YP Project with municipal development plans and regional land use frameworks; and
- Plans to prevent the spread of pathogens, weeds, and pests, including clubroot, on agricultural lands crossed by the YP Project.

163. In addition to the EE, the EPPs itemize and summarize all of the mitigation measures and monitoring measures that AP is committed to implementing during construction and operation of the YP Project to minimize any adverse effects on the environment (Attachments D1 and D2).

164. AP also engaged Montrose to prepare a Stormwater Management Plan (SMP) to address potential precipitation runoff at the YP Facilities. The SMP assesses potential impacts of the site on surface runoff, potential design concerns related to the management of surface runoff (e.g., grade plans), and measures to mitigate potential environmental impacts within the local study area and the YP Project footprint. The SMP will be finalized prior to construction of the YP Facilities.

165. AP considered the presence of federal and non-federal lands in assessing the preliminary route segments. Upon selection of the final Preferred Route, AP determined that no federal lands (i.e., First Nation reserve land, national parks, or military lands) are intersected by the YP Project footprint (i.e., construction or operational footprint) and, accordingly, federal impact assessment requirements do not apply to the YP Project.

166. Overall, AP is of the view that the findings of the EE indicate that the potential effects associated with the construction and operation of the YP Project are not unique to the YP Project and are similar to other pipeline projects in the area. The EE found that the potential environmental and cultural effects are not significant, as any potential impact

to the associated VCs from construction activities can be readily mitigated by the measures detailed in the EPPs.

5.3 Historical Resources

167. AP recognizes the potential for encountering sites of historical resource value along the proposed RoW. On March 14, 2025, Ember Archaeology (Ember), on behalf of AP, submitted an application for clearance under the *Historical Resources Act* (HRA) to the Department of Alberta Arts, Culture and Status of Women (ACSW). It has been determined that a Historic Resource Impact Assessment (HRIA) and subsequent HRA approval are required for the proposed YP Project.

168. Through desktop investigations, Ember determined that within 10 km of the project HRIA area there is a HRV 1a site, three HRV 3a sites, fifty-nine HRV 4a sites, and 521 HRV 0a sites, with 13 sites still pending HRV ranking. Twenty-six of these sites are located within 150 m of the Preferred Route centerline, and 15 sites currently intersect the YP Project footprint.

169. On August 25, 2025, ACSW granted approval for Ember to conduct the required field investigations, as per ACSW approval number: 4780-25-0097-002. The fieldwork to inventory and evaluate the potential for YP Project interaction with historic resources is expected to occur between September and November 2025. Where Ember will identify potential impacts on significant historic resources and recommend strategies to mitigate the impacts of the YP Project.

170. Additional field investigations will be required in Q1 or Q2 of 2026, in which case Ember will comply with the “Archaeological Survey Information Bulletin: Winter Conditions” if the investigations take place during frozen ground conditions. Once the field inspections have been completed, Ember will submit the HRIA report to ACSW for review and approval.

171. While AP does not currently have final HRA approval and conditions to construct at the time of filing this Application, AP will continue to work with ACSW over the next

several months to obtain final approval and will not commence construction work on the YP Project until HRA clearance has been received.

5.3.1 Paleontological sites

172. There are four known HRV 5p sites within the YP Project Preferred Route, and there are no known 4p lands that intersect the YP Project Preferred Route. The nearest 4p land notation is located approximately 1 km away from the Preferred Route. No HRV 1p to 2p lands were noted within 25 km of the Preferred Route; however, HRV 3p lands were recorded to the south of the YP Project and to the south of Wabamun Lake in the large-scale open-pit Highvale Coal Mine. Fossil resources were also observed at the reclaimed Whitewood Mine on the north side of Wabamun Lake.

5.3.2 Traditional Use Sites of a Historical Resource Nature

173. One traditional use site has been identified within 150 m of the YP Project Preferred Route. However, the YP Project is not expected to impact the traditional use site.

5.4 Surface Disturbances in Transportation Utility Corridor

174. Neither the YP Mainline nor related activities will result in a surface disturbance in the transportation utility corridors.

5.5 Other Agency Approvals

175. In addition to the authorization sought in this Application, AP took into consideration other relevant legislation; including, but not limited to the provincial *Water Act*, PLA, and EPEA, as well as the federal *Fisheries Act* and *Canadian Navigable Waters Act*. AP must file applications to, and obtain other approvals from, federal and provincial governmental agencies, as well as local and municipal authorities, for the necessary approvals in connection with the YP Project. In preparing these applications, these agencies were provided information on the YP Project as part of AP's PIP. A summary of the PIP, including results of agency notifications and consultations, is included in Section 4 of this Application.

5.5.1 Municipal Approvals

176. The following municipalities under the *Municipalities Government Act* (MGA) are located along the YP Project Preferred Route:

- Yellowhead County;
- Parkland County;
- Lac Ste. Anne County;
- Sturgeon County;
- Strathcona County; and
- City of Fort Saskatchewan.

177. As part of AP's PIP, AP provided information on the YP Project to all of the above municipalities.

5.6 Other Acts and Approvals

178. Details regarding other acts that may apply to the YP Project, other approvals that the YP Project may require, and the status of each of those approvals, are provided in Table 23 below. AP will ensure all other required approvals have been obtained prior to the construction of the YP Project. Further, the YP Project will be built and operated in accordance with all applicable safety legislation, including the SCA, and will be inspected and declared safe prior to being put into service.

Table 23: YP Applicable Acts and Regulation

Regulator	Applicable Regulation	Status
Provincial		
Alberta Energy Regulator (AER)	<i>Pipeline Act</i>	AP is committed to meeting all regulations and standards as outlined in the <i>Pipeline Act</i> .
Government of Alberta	Consultation with First Nations on Land and Natural Resource Management (2013)	AP has worked with the Aboriginal Consultation Office (ACO) to ensure strong collaboration and consultation with Indigenous groups impacted by the YP Project. Please refer to Attachment B7 A for a list of the ACO's decisions.
Alberta Transportation and Economic Corridors (TEC)	<i>Highways Development and Protection Act</i> - Application for Placement of Underground Oil and Gas (Highway Crossings)	AP will apply for all necessary approvals required under the <i>Highways Development and Protection Act</i> as required.

Regulator	Applicable Regulation	Status
TEC	<i>Highways Development and Protection Act - Oversize/Overweight Permit</i>	AP will require that all contractors obtain and provide the required permits necessary to bring equipment to the YP Project site locations throughout the construction of the YP Project.
AER	<i>Directive 050 – Drilling and Waste Notification</i>	AP will comply with all requirements under this Directive applicable to the YP Project.
AER	<i>Directive 038 – Noise Control</i>	AP conducted a Noise Impact Assessment (NIA) in accordance with AUC Rule 012.
AER	Frac Out Reporting	Should AP experience the loss of subsurface integrity during a crossing, AP will report the loss of containment as required. Please refer to Appendix D for the Fuels and Hazardous Materials Spill Contingency Plan.
AER	<i>Environmental Protection and Enhancement Act (EPEA) – Activities Designation Regulation</i>	AP will submit an application to the AER for approval under the EPEA for the portion of the YP Project that is designated as an activity under the <i>Activities Designation Regulation</i> .
AER	<i>Environmental Protection and Enhancement Act (EPEA) – Code of Practice for the Release of Hydrostatic Testing of Petroleum Liquid and Gas Pipelines</i>	AP will comply with all applicable requirements under this Code of Practice.
AER	<i>Water Act - Code of Practice for the Temporary Diversion of Water for Hydrostatic Testing of Pipelines</i>	AP will comply with all applicable requirements under this Code of Practice. AP will provide any required Code of Practice Notification(s) to the AER at least seven (7) calendar days before the hydrostatic testing is commenced. If the expected water withdrawal for hydrostatic testing is estimated to be over 30,000 m ³ AP will apply for a Temporary Diversion License as required.
AER	<i>Water Act - Code of Practice for Pipelines and Telecommunication Lines Crossing a Water Body</i>	AP will comply with all applicable requirements under this Code of Practice. AP will provide any required Code of Practice Notification(s) to AER at least 14 days prior to the commencement of any works or activities to support pipeline crossings associated with wetlands and watercourses.
AER	<i>Water Act - Code of Practice for Watercourse Crossings</i>	AP will comply with all applicable requirements under this Code of Practice. AP will provide any required Code of Practice Notification(s) to AER at least 14 days prior to the commencement of any works or activities associated with temporary vehicle and equipment crossings associated with wetlands and watercourses.

Regulator	Applicable Regulation	Status
AER	<i>Public Lands Act</i>	The YP Project will apply for any necessary dispositions, including easements and temporary workspace, to work on provincially held Crown land.
Alberta Safety Codes Council (ASCC)	<i>Alberta Safety Codes Act</i>	AP or the general contractor will apply for the permits required under the various building, electrical and gas disciplines, during construction. AP will register all pressure systems as required with the Alberta Boiler Safety Association.
Minister of Agriculture and Forestry and respective Municipalities	<i>Weed Control Act</i>	AP will follow the weed control methods outlined in the YP Biosecurity Management Plan. Please refer to Appendix C and D for AP's Environmental Evaluation and Environmental Protection Plans, respectively.
Minister of Agriculture and Forestry with respective local authorities and the Agricultural Services Board (ASB)	<i>Agricultural Pests Act – Clubroot Prevention</i>	AP will follow the clubroot prevention measures outlined in the YP Biosecurity Management Plan. Please refer to Appendix C and D for AP's Environmental Evaluation and Environmental Protection Plans, respectively.
The Government of Alberta	<i>Forest and Prairie Protection Act – Burning</i>	If AP performs burns in a Forest Protection Area from March to October, AP will apply for any required permits.
Minister of Arts, Culture, and Status of Women (ACSW)	<i>Historical Resources Act</i>	AP has obtained the following HRA approvals in respect of the YP Project: 4780-25-0093-001, 78025-0093-002
Alberta Environment and Protected Areas (AEPA)	<i>The Alberta Wildlife Act- Wildlife Research Permit & Collection Licence</i>	AP has hired a professional biologist who holds a province wide permit to conduct species specific surveys for sensitive species (e.g. sharp-tailed grouse and western toad) and handle amphibians for ID and salvage, if encountered.
Federal		
Environment and Climate Change Canada (ECCC)	<i>Species at Risk Act (SARA)</i>	This Act applies to all species listed on Schedule 1 of the federal SARA. Should the YP Project impact critical habitat for any species listed in the SARA, AP will apply for the required approvals.
Fisheries and Oceans Canada (DFO)	<i>Fisheries Act</i>	A Letter of Advice was issued for the YP Project by DFO September 23, 2025. AP will implement the recommended mitigation measures as required.

Regulator	Applicable Regulation	Status
Transport Canada	<i>Canadian Navigable Waters Act (CNWA) – Minor Works</i>	It is anticipated that AP will need to file approximately 20 notifications under the Minor Works Order in respect of the YP Project. AP will comply with all conditions required as per the Orders and CNWA.
Environment and Climate Change Canada (ECCC)	<i>Migratory Birds Regulation (MBR)</i>	AP will conduct wildlife sweeps to identify nests features or roosting cavities before construction and will implement the necessary setbacks prior to construction. The MBR requires no formal approval.
Environment and Climate Change Canada (ECCC)	<i>Canadian Environmental Protection Act – Greenhouse Gas Reporting, Multi-Sector Air Pollutant Regulations, and Methane Regulations</i>	AP will report the emissions from the YP Project in accordance with these regulations as required.

5.7 Agricultural Operations

179. Pipeline RoWs and facilities can potentially impact agricultural land and agricultural operations, which are addressed through reclamation and/or compensation, as appropriate. AP will engage with landholders during construction and reclamation and will endeavour to reach agreements with landholders respecting appropriate compensation for impacts to agricultural operations.

180. To minimize the potential spread of crop disease and noxious weeds, AP will apply an appropriate level of cleaning to all equipment that will be used in fields where Clubroot, noxious weeds, or soil-borne diseases are a concern. The level of cleaning required will be determined through engagement with the landowner, local agricultural fieldman or the relevant municipality.

181. Please refer to the EE in Appendix C and the EPPs in Appendix D for additional mitigation measures that will be undertaken by AP.

SECTION 6: TECHNICAL CONSIDERATIONS

6.1 Overview

182. This section outlines the technical considerations and compliance requirements related to the construction and operation of the YP Project.

6.2 Existing Approvals for Facilities Directly Affected by YP Project

183. The construction and operation of the facilities comprising the YP Project will require minor alterations to existing pipelines owned by AP and NGTL, as detailed below. For clarity, no amendments to any existing AP approvals are required as a result of the YP Project.

6.2.1 AP Facilities

184. The AP Salt Cavern Transmission Pipeline will be modified to connect with the new YP Mainline at the proposed YP East Control Station. AP is currently operating the Salt Cavern Transmission Pipeline pursuant to Licence No. 16723 issued by the AUC.

6.2.2 NGTL Pipeline System

185. The NGTL January Creek Pipeline will also be modified to interconnect with the new YP Mainline at the YP West Interconnect. NGTL is operating the January Creek Pipeline pursuant to Order GH-5-2008 and Certificate GC-113 issued by the National Energy Board, the predecessor to the CER.

6.3 NOx Emissions

186. The combustion of natural gas and other fuel sources can contribute to NO_x emissions into the atmosphere. The operation of the YP Compressor Station will require the combustion of natural gas as a fuel source. To determine the potential NO_x emissions resulting from the YP Compressor Station's operation, AP hired a third-party contractor to conduct dispersion modelling in accordance with the Alberta Environment and

Protected Areas (AEPA)¹¹ Air Quality Model Guideline. Please refer to Table 24 below for the maximum predicted NO₂ emissions from the YP Compressor Station.

Table 24: YP Compressor Station NO₂ Emission Maximum Predictions

Averagin g Period	Background Ambient Concentrations ug/m3	Compressor Station Maximum Predictions - NO2				AAQOs ug/m3
		Project Only Case		Cumulative Case		
		ug/ m3	% of AAQO	ug/m3	% of AAQO	
1-hour	31.9	69.3	23%	178.98	60%	300
Annual	8.9	1.02	2%	19.73	44%	45

187. As shown in Table 24 above, the maximum predicted 1-hour and annual averaging period concentrations of NO₂ for the YP Compressor Station in the Project Only and the Cumulative Case are compliant with the Alberta Ambient Air Quality Objectives. Similarly, the engine exhaust stack height was set at 10.825 m in the dispersion modeling, which is in accordance with the direction given in the *AEPA Code of Practice for Compressor and Pumping Stations and Sweet Gas Processing Plants*.

188. AP confirms that the NO₂ emissions from the YP Compressor are below the threshold established by regulation, and therefore, this facility does not require registration with the AER.

6.4 Audible Noise Levels

189. Natural gas transmission facilities can produce low levels of audible noise during operation. Under AUC Rule 012: Noise Control (Rule 012), the cumulative permissible sound level (PSL) – including typical rural ambient background noise – at a rural residence in fair weather is 40 A-weighted decibels (dBA) at night and 50 dBA during the day, with the potential for an A2 adjustment in situations where desktop ambient sound level (ASL) values do not accurately represent the acoustic environment. AP has designed all components of the YP Project to ensure these PSL requirements are met.

¹¹ AEPA is the successor to Alberta Environment and Parks (AEP).

190. AP will comply with Section 2.10 of Rule 012 during construction activities and will advise nearby residents of significant noise-causing activities and schedule construction activities to reduce disruption to residences. AP will also ensure that construction activities are completed between 7:00 am and 10:00 pm and that all equipment is well-maintained to reduce noise disruption.

6.4.1 YP East Control Station

191. AP retained FDI Acoustics Inc. (FDI) to conduct a noise impact assessment (NIA) for the YP East Control Station in accordance with AUC Rule 012. The purpose of the NIA was to assess potential noise impact from the YP East Control Station in the context of the requirements specified in AUC Rule 012. Please refer to Table 25 below for the predicted audible noise levels at the YP East Control Station.

Table 25: Calculated Audible Cumulative Noise Levels of YP East Control Station¹²

Scenario	Daytime (dBA)	Nighttime (dBA)
Predicted Cumulative Sound Level	49.4	47.7
Predicted Cumulative Sound Level with Noise Control	45.6	39.2
Permissible Sound Level	50.0	40.0

192. As shown in Table 25 above, the YP East Control Station is predicted to exceed the nighttime audible noise limits of Rule 012 at the nearest dwelling without any noise control measures installed. Given this, AP will implement the noise control measures recommended by FDI to ensure compliance with the PSLs under Rule 012 prior to the YP Project going into service, namely installing acoustical pipe lagging on the exterior components, including both the upstream and downstream sections inside and outside the pressure control building, and installing removable acoustical blankets or enclosures to ensure adequate noise attenuation. Please refer to Attachment E1 for the FDI Noise Impact Assessment report in respect of the YP East Control Station.

6.4.2 YP Compressor Station

193. AP retained WSP Canda Inc. (WSP) to conduct a NIA for the YP Compressor Station in accordance with AUC Rule 012. The purpose of the NIA was to assess potential noise impact from the YP Compressor in the context of the requirements specified in AUC Rule 012. As the detailed design of the YP Compressor Station is not complete at the time of filing of this application, two different scenarios were incorporated into the NIA; the primary difference between the two scenarios is the amount of compressor station piping that is assumed to be installed above ground versus buried below ground. Please refer to Table 26 below for the predicted audible noise levels at the YP Compressor Station.

Table 26: Calculated Audible Cumulative Noise Levels of YP Compressor Facility¹³

Scenario	Daytime (dBA)	Nighttime (dBA)
All Project Piping is Above Ground	47	43
The majority of Project Piping is Below Ground	47	43
Permissible Sound Level	50	43*

* In completing the NIA of the compressor station, WSP determined that an A2 adjustment of +3 dBA to the nighttime PSL limit was appropriate at the nearest receptor point, bringing the nighttime PSL to 43 dBA.

194. The YP Compressor Station is within the audible noise limits of Rule 012, as shown in Table 26 above. Please refer to Attachment E2 for the WSP Noise Impact Assessment report in respect of the YP Compressor Station for more details.

6.5 Hydrogen Sulphide Specifications

195. The natural gas flowing from the receipt point for the YP Project will have an H₂S content of up to 0.01596 mol/kmol and a partial pressure of H₂S in the gas phase of less than 0.30 kilopascals.

¹³ Assessed potential noise impacts are from normal Project operations. This includes two gas turbine compressor packages, one station aerial cooler, two instrumental air compressor packages with a power rating of 8.5 kW, various pipes, valves, building exhaust fans, and building heating, ventilation, and air conditioning units.

6.6 Compliance with CSA Z662 and ASME B31.3, and Supporting Diagrams

6.6.1 YP Project

196. The YP Project is designed and will be constructed and operated in accordance with all applicable CSA Z662 requirements, including the standards and specifications applicable to steel pipe, fittings, flanges, and valves outlined in Table 5.3 of CSA Z662. Where applicable, the components of the YP Project under the jurisdiction of the SCA will comply with all design requirements under CSA B51.

6.6.2 YP Compressor Station

197. Steel pipe, fittings, flanges, and valves within the YP Compressor Station will meet the applicable requirements of a standard or specification given in Table 5.3 of CSA Z662. Steel pipe, fittings, flanges, and valves within the YP Compressor Station, which are subject to the SCA, will meet the applicable requirements of standards or specifications specified in Table 326.1.1-1 of American Society of Mechanical Engineers (ASME) B31.3.

198. Piping will be designed to meet the version of ASME B31.3 declared in force by the Alberta Boilers Safety Association (ABSA) at the date of design authentication.

199. Please refer to Attachment F1 and F2 for process flow diagrams for the YP Compressor Station. These documents outline the following:

- All existing and proposed equipment, including process equipment, measurement points, and safety equipment;
- Inlet or receipt and delivery sources, including fuel lines, flare lines, and vent points, where applicable; and
- A legend and annotations clearly identifying new equipment.

200. Please refer to Attachment F3 for a plot plan for the YP Compressor Station, which indicates the on-lease location of all the equipment indicated in the above-mentioned process flow diagrams shown in Attachments F1 and F2.

6.7 Emergency Response Plan

201. AP will comply with its corporate-level emergency response plan (ERP) to address any emergency situations arising during the construction and operation of the YP Project. AP will work with all its contractors to ensure that all personnel engaged in the construction and operation of the YP Project are aware of the ERP and that the procedures contained therein are followed in the event an emergency situation arises.

6.8 Compliance with Procedures for Corrosion Mitigation, Monitoring, Evaluation, and Record Keeping

202. AP will develop and implement procedures regarding corrosion mitigation, monitoring, evaluation, and record-keeping prior to operation of the YP Project. AP is committed to following best practices and ensuring compliance with these procedures throughout the YP Project's life cycle.

6.9 Flaring, Incinerating, and Venting

203. The YP Project will comply with the flaring, incinerating and venting operational requirements outlined in Section 13.7 of AUC Rule 007.

6.10 Storage Requirements

204. The YP Project will not require storage or materials produced, generated, or used by upstream petroleum, gas, geothermal, or brine-hosted mineral resource development. Therefore, Section 13.8 of Rule 007 is not applicable to the YP Project.

SECTION 7: CONCLUSION

205. AP submits that this Application meets or exceeds the requirements under Rule 007. The information outlined in the AUC's Gas Utility Pipeline Licence Application Form has been addressed throughout this Application, and this completed form is provided in Appendix G.

206. The applied-for Preferred Route proposed in this Application was selected based on a comprehensive examination of routing benefits and constraints within the study area, as informed by AP's engagement with all potentially affected stakeholders and application

of the routing criteria detailed in Section 3. The PIP, detailed in Section 4, ensured that all potentially impacted stakeholders' concerns were heard and considered in determining the applied-for Preferred Route, which is, in AP's view, superior to all other alternatives and will provide the most benefit to the Integrated Alberta System and its ratepayers today and in the long term.

207. AP respectfully requests the Commission to review and approve this Application and to issue the required license to construct and operate the YP Project.

208. All of which is respectfully submitted this 4th day of November 2025.

LIST OF APPENDICES AND ATTACHMENTS**Appendix A – Facility & Technical Diagrams**

Attachment A1 – Right-of-Way Plan

Attachment A2 – Geospatial Data of Pipeline Segments

Appendix B – Participant Involvement Program Materials

Attachment B1 – Yellowhead Pipeline Project Information from ATCO's Website

Attachment B2 – Sample Participant Involvement Program Information Package

Attachment B3 – Example of Open House Door Hanger

Attachment B4 A – Example of Digital Marketing for Preliminary Route Open Houses

Attachment B4 B – Example of Digital Marketing for Preliminary Preferred Route Open Houses

Attachment B5 – Open House Materials

Attachment B6 A – Complete Line List of all Tracts

Attachment B6 B – Directly Affected Stakeholders Requiring Confirmation of Non-Objection

Attachment B6 C – Personal Consultation within 100m of Directly Adjacent Stakeholders

Attachment B6 D – 200m Notification Stakeholders

Attachment B6 E – Compressor Notification Line List

Attachment B7 A – Aboriginal Consultation Documents

Attachment B7 B – Consultation Mitigation Table

Attachment B7 C – Consultation Overview all Communities

Attachment B8 – Example of Confirmation of Non-Objection Documentation

Attachment B9 A – Listing of Objections and Concerns – Directly Affected Stakeholders

Attachment B9 B – Listing of Concerns – Adjacent Stakeholders

Appendix C – Environmental Evaluation**Appendix D – Environmental Protection Plan**

Attachment D1 – Environmental Protection Plan – Mainline

Attachment D2 – Environmental Protection Plan – Facilities

Appendix E – Noise Impact Assessment Reports

Attachment E1 – YP East Control Station Noise Impact Assessment Report

Attachment E2 – YP Compressor Station Noise Impact Assessment Report

Appendix F – Technical Diagrams

Attachment F1 & F2 – Process Flow Diagrams

Attachment F3 – Plot Plan

Appendix G – Rule 007 Gas Utility Pipeline Licence Application Form