

Hi Jennifer,

This letter contains my second round of comments on Canada Premium Sand Inc's (CPS) proposal for an Environmental License (License) under the Manitoba's Environment Act (Act) for the Wanipigow Sand Extraction Project, Public Registry File No. 5991.00 (Proposal).

This document is broken into 3 main sections: 1) commentary on CPS's responses, 2) items not addressed in my first comment submission and 3) new/additional comments. In place of questions this letter contains many requests for additional detailed information. Unfortunately that may mean that CPS isn't obligated to respond to anything directly; however, I trust that MSD will consider enforcing these requests as they are all well within what I consider to be standard engineering and environmental practice for mine planning and development.

Commentary on CPS's responses

GW1

I believe this response missed the point. Pumping is required to keep the excavation dry. This means groundwater levels will rebound without pumping, leaving abandoned extraction cells under water. This does not reconcile with CPS's current plan to revegetate abandoned cells to blend in with the surrounding boreal forest.

GW2

Understood, operations will be in accordance with the License. A response that defers future actions to an as yet to be seen License demonstrates a lack of planning and understanding.

GW3

I like seeing that CPS is developing various monitoring, management and control plans under an Environmental Management Program. However, I cannot provide comment on plans that haven't been provided. CPS must submit a copy of these plans for public and TAC review and comment prior a License being issued.

I would presume when it comes to groundwater that these plans will include detailed drawings showing how CPS proposes to accomplish their stated goals. I would also expect a detailed plan committing to establishing baseline groundwater quality and quantity in all local wells prior to operating and a financial plan to replace/upgrade wells if deleterious effects are observed via regular monitoring.

GW4

The response refers back to various subsections of Section 6 in the EAP. I believe that many of the effects that have been reported in this section are arbitrary, subjective, unsubstantiated and speculative and this is unacceptable. More, if not all, of the affects assessments in Section 6 need to be science based and updated to reflect analysis results.

GW5

CPS has updated their well inventory. Although this is a step in the right direction I believe CPS also has an obligation to identify as many actual in-place wells as possible. Baseline groundwater quality and

quantity information must also be collected so that they can demonstrate what effects, if any, their operations are having on wells.

GW6, 7 and 8

CPS is currently completing geotechnical and hydrogeological studies. There is no new information here and so I cannot provide comment on something that hasn't been provided. CPS must submit all technical documents for public and TAC review and comment prior to a License being issued.

I have particular interest in the geotechnical and hydrogeological reports. These reports must include all supporting information, including but not limited to:

- detailed test hole logs and plans including identification of what instruments and/or wells were installed with detailed drilling notes,
- instrument installation details,
- instrument monitoring data and plots,
- in-situ and laboratory testing data and results on soil (such as blow counts, soil strength, plasticity indices, particle size analysis, etc.),
- in-situ and laboratory testing data and results on groundwater (such as pump tests, slug tests, lugen tests, permeability tests, water quality, etc.),
- groundwater/aquifer drawdown and flow modelling methods (such as model types, solution methods etc.), inputs and assumptions (such as storativities, transmissivities, specific yields, hydraulic conductivities, boundaries, etc.), and results (such as software outputs, summary plots, tables, sensitivity analyses, etc.),
- slope stability modelling methods (such as finite element, limit equilibrium, total or effective stress analysis, etc.), inputs and assumptions (such as boundaries, soil strain, strength and seepage parameters, etc.), and results (such as software outputs, summary plots, tables, sensitivity analyses, etc.).

I expect that collection of instrumentation data and groundwater information should occur frequently and regularly over the course of at least one full year to glean insight into seasonal variability. This is what any prudent engineering and environmental consultant would insist on to support their work. If CPS submits these reports sooner I must proactively conclude that AECOM prepared these reports hurriedly as a result of inappropriate pressure from CPS. If this occurs, it is likely that these reports will contain significant information gaps and will be incomplete.

I expect that a significant portion of the hydrogeological report will be spent discussing various groundwater modelling analyses and results, including predictive models that incorporate mine expansion as excavation cells and dewatering efforts spiral outwards. Effects on both the unconfined perched and the granite aquifer groundwater systems over the entire life of the mine, including post closure, as a result of CPS's proposed long term dewatering and drastic landscape changes need to be modelled and reported in detail. I would also expect to see detailed engineering plans and designs for minimizing, or preferably completely eliminating, possible deleterious effects to both of these groundwater systems (such as seepage cutoff walls, grout curtains, bedrock fracture grouting programs, etc.).

SW1 to 4

Most of CPS's responses to these questions point towards developing various monitoring, management and control plans under an Environmental Management Program. I cannot provide comment on plans that haven't been provided. CPS must submit a copy of these plans for public and TAC review and comment prior a License being issued.

I would presume when it comes to surface water that these plans will include detailed drawings showing how CPS proposes to accomplish their stated goals.

Wild1

Understood.

AirQ1 and 2

A revised Air Quality report was submitted. The revised report still shows exceedances.

CPS's response to these questions also points towards developing various monitoring, management and control plans under an Environmental Management Program. I cannot provide comment on plans that haven't been provided. CPS must submit a copy of these plans for public and TAC review and comment prior a License being issued.

I would presume when it comes to air quality that these plans will include developing baseline air quality information prior to operating and then a commitment to regularly monitor air quality afterwards to show what effects, if any, are occurring. There must be monitoring points in all developments regardless of official zoning. I would also expect a commitment to alter operations if air quality is shown to be deleteriously affected, including but not limited to ceasing operations during certain weather events, wind speeds, wind directions, droughts, etc.

Noise1

A 100 m buffer from residences is unacceptable. Extraction operations, including clearing, must remain a minimum of 1 km from property boundaries and a minimum of 500 m from existing roads. Noise is only one reason among many for selecting these values.

Infra1 and Traffic1

A technical memo from AECOM's transportation group was provided. Compared to 2017 traffic volumes, an increase of 32% and 19% (a lesser conservative 28% and 16% is reported because volumes were compared against 2009, not 2017) can be expected once CPS is in full operations. These are not trivial increases, especially considering that this increase will be almost exclusively large transport vehicles. A large increase in liability is associated with this increase in truck traffic, which is a liability that I'm sure CPS would rather defer. I predict that CPS will inevitably end up contracting this service out to transport firms. Safety will ultimately then end up on the contracted firm, not CPS.

As an aside comment, if CPS does eventually defer transport to a firm I see many of the jobs they claim to be creating vanishing quickly.

HH1 and 2

CPS's response points towards developing various monitoring, management and control plans under an Environmental Management Program. I cannot provide comment on plans that haven't been provided. CPS must submit a copy of these plans for public and TAC review and comment prior a License being issued.

CP1

No response is provided. I must insist that CPS submit a closure plan as part of their License Proposal. Closed mines inevitably end up being the Province's responsibility. With this in mind I simply cannot conceive that the Province would find it acceptable to License a mine without first having a detailed closure plan filed. I again raise the recent legal precedent made in Alberta that puts the obligation on companies, even in bankruptcy, to clean up and decommission old, abandoned or orphaned wells.

PD1

I've driven the highway north of Fort McMurray that weaves through and around oil sand tailings dams. Although this is an extreme example, it's a reasonable visual when trying to imagine what travelling through the area may look like if CPS is allowed to extract sand right up to and on either side of a road. In addition to the buffer requirements noted above in Noise1, extraction must also not be permitted across any existing roads.

Items not addressed in my first comment submission


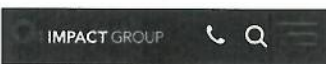

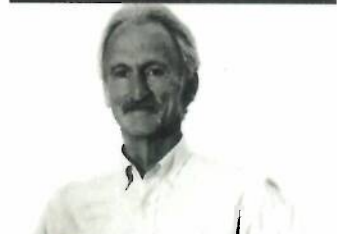


A couple comments from my first submission weren't addressed.

- 1) Little or no acknowledgement of the cottage and recreational developments in the area, namely Mantago Bay, Driftwood Beach, Blueberry Point, Ayers' Cove, and Pelican Inlet. Many of which share property lines with the proposed mine.

Although my comment in particular wasn't addressed directly, it can be seen throughout CPS's response that they are trying their very best to not acknowledge the existence of Mantago Bay, Driftwood Beach, Blueberry Point, Ayer's Cove, and Pelican Inlet. When they do have to acknowledge us, they focus on the 'Recreational' zoning of these developments and say that they aren't obligated to treat us the same as Manigotagan, Seymourville, Hollow Water First Nation, and Aghaming. I know for a fact that there are many permanent residents in Pelican Inlet, as well as the other cottage developments. I also know for a fact that CPS knows this. This is unacceptable and demonstrates an arrogant disregard.

I have friends and family who work in environmental science and engineering, and the same message that I get from them all is that it is standard practice to select/identify the most conservative measure for assessing effects, regardless of official zoning. I must assume that AECOM's environmental staff on this project would do the same given the chance so I have to conclude that the clear disregard for Mantago Bay, Driftwood Beach, Blueberry Point, Ayer's Cove, and Pelican Inlet is more than certainly a CPS directive. Funnily enough, CPS's staff profiles say they reside in Seymourville while I'm fairly certain that Bob, Bronwyn, Ami and a good number of their contractors have been living/staying in Pelican Inlet since Fall 2018 (see reproduced images below taken from www.g4impact.com). This seems silly to bring up but it's

important to highlight because it demonstrates dishonesty. If they're petty enough to be dishonest about where they are living, I wonder what else they are being dishonest about.

		
		
<p>Bob Archibald CHAIRMAN</p>	<p>Bronwyn Weaver PRESIDENT/ VISION & STRATEGY</p>	<p>Ami Gignac EXECUTIVE VICE PRESIDENT</p>
<p>Bob has stepped back from all day-to-day operations at Q4 to focus on his new position as Chief Operating Officer at Canadian Premium Sand. He is deeply committed to this project for the long-term and is living full-time in Seymourville, Manitoba. Bob is experienced in all operations, engineering and management aspects of the</p>	<p>Bronwyn has stepped back from the day-to-day business of Q4 to fulfill her position as Communications & Community Liaison Officer at Canadian Premium Sand. She brings her passionate commitment to this project for the long-term and is living full-time in Seymourville, Manitoba. Bronwyn's creative arsenal is stocked with skills collected over a wide range of industries.</p>	<p>Ami has stepped away from day-to-day operations at Q4 to jump into her position as General Manager at Wanipigow Sand for Canadian Premium Sand. She's ridiculously committed to this project for the long-term and is living full-time in Seymourville, Manitoba. Ami began her career as a front-line shift supervisor at one of the largest limestone quarries in</p>

- 2) CPS still isn't acknowledging that their reclamation plans will not work. They continue to insist that the area will be reshaped and revegetated to blend in with the surrounding boreal forest.

Logic experiment: CPS is removing X from the ground where X is comprised of Y, overburden, and Z, silica ($X = Y + Z$). CPS is processing and transporting a significant volume of Z to buyers, leaving Y behind. CPS is using Y for various purposes within the mine site, including berms around extraction cells for safety, noise and wind borne sediment collection. Eventually CPS says they'll replace Y into finished cells, but in reality they are replacing U, which is less than Y, because they will always need a large portion of Y for berms ($U < Y$). So U is going back into the finished cells, which is significantly less than the original volume X ($U < Y < X$). Considering that: 1) groundwater levels on site can occur as shallow as about 5' below surface (sometimes even at ground surface in wet areas) and 2) the large abandoned extraction cells will become a regional topographical low and subsequently a collection point for precipitation and runoff, the only logical conclusion is that finished extraction cells will end up under water (see photo below of Reynold's Ponds in the RM of Reynolds east of Winnipeg). CPS must acknowledge this and revise their Proposal accordingly. Continuing down their current path is irresponsible and foolish.



New/additional comments

- 1) Recently Manitoba Sustainable Development (MSD) asked CPS to hold another public meeting. CPS responded by scheduling a meeting for April 17 in Seymourville. Although this is great, I believe that this still falls short of CPS's obligation to broadcast their plans as much as possible. CPS's operations and effects are not isolated to the immediate vicinity of the mine site, evidenced by their plan to transport their product by truck directly to the buyer for an undetermined amount of time before eventually transporting their material to a yet to be Licensed intermodal facility in or near Winnipeg. I must insist that the Province require CPS also hold meetings along the proposed transport route as well as in or near Winnipeg prior to being issued a License.
- 2) CPS has a duty to consult and engage with indigenous communities. Although it would seem that this is ongoing with Hollow Water First Nation, I have not seen any evidence that any other communities, such as Black River, Sagkeeng, and Bloodvein First Nations, among many others, are being meaningfully consulted and engaged. Furthermore, I have also not seen any evidence that CPS has meaningfully consulted or engaged with the Manitoba Metis Federation. In fact, CPS's response doesn't acknowledge a comment on this very issue that was raised by Lynn and Denis Berthelette in the first round of comments from the public.

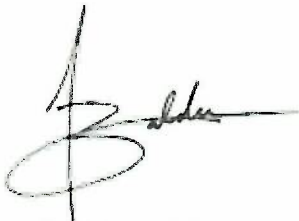
Closure

Many of CPS's responses defer to documents that weren't submitted for review, such as engineering reports, the Environmental Management Program and the Closure Plan. I can't possibly assess effects and understand what is being proposed when supporting information isn't available for review. A 'promise to do it right when the time comes' is insufficient, lazy and demonstrates poor planning. These documents, as well as any other supporting documents that may be under development, must be made available for public and TAC review prior to being issued a License.

When these documents are submitted, I expect CPS to firmly commit to operating within established regulatory as well as self-defined, measureable, healthy and scientifically derived thresholds. I also expect to see CPS commit to treating cottage developments surrounding their mine site with the same respect as the other surrounding communities, this includes applying the same conservative measures for assessing affects, regardless of official zoning.

I also expect to see more public meetings held along their proposed haul route as well as near or in Winnipeg so that the largest catchment possible is afforded an opportunity to attend.

I strongly recommend that Manitoba Sustainable Development deny CPS a License under the Act after this second round of public and TAC comments. I also strongly recommend that MSD inform CPS that their Proposal will not be considered again until such time that it is wholly resubmitted, complete with all supporting and detailed technical documents, Environmental Management Program, engineering designs, and Closure Plan – anything less is a waste of everyone's time.

A handwritten signature in black ink, appearing to read 'Jared Baldwin', with a stylized flourish extending to the right.

Jared Baldwin, M.Sc., P.Eng.



Myers LLP

Barristers & Solicitors

April 8, 2019

Reply to: Alex J. Nisbet
File No. 29833-217 JBH

Via Email

Environmental Approvals Branch
Manitoba Sustainable Development
1007 Century Street
Winnipeg MB R3H 0W4

Attention: Jennifer Winsor

Dear Madam:

RE: Wanipigow Sand Extraction Project – File: 5991.00

Please be advised that we represent Sagkeeng First Nation ("SFN") regarding the Wanipigow Sand Extraction Project (the "Project"). This letter is in response to your email correspondence dated March 14, 2019 seeking further comments or questions regarding the additional information provided by Canadian Premium Sands Inc. ("CPS") regarding the Environment Act Proposal ("EAP"). This letter is to serve as SFN's comments regarding the additional information provided by CPS.

To date, there has been no consultation with SFN regarding the Project. SFN members exercise their Treaty and Aboriginal rights to hunt, fish and harvest in SFN's traditional territory, especially on Lake Winnipeg and along its shorelines. The Project Site, the Local Project Area, and the Regional Project Area are situated within SFN's traditional territory. These comments do not constitute consent or agreement to the Project and this is not, and is not to be considered to be, consultation.

Upon review of "Table 2: Responses to Public Review Comments" (hereinafter the "Responses") as provided by CPS, we were alarmed by the fact that CPS did not answer or acknowledge several specific issues raised in my correspondence dated February 12, 2019. In fact, the Responses only answered one issue we had raised which related to fish and fish habitat. Two major issues that went unanswered and unacknowledged are as follows:

1. SFN exercises traditional hunting rights over the Project Regional Area. SFN is unsure as to how AECOM came to the conclusion that the Project Site is not within a Traditional Territory of SFN as no consultation with SFN or its members has occurred to date.
2. During the operation phase, 3 to 4 trucks per hour will be loading sand at the facility for transportation to Winnipeg for distribution. SFN is located adjacent to PR 304 which appears to be the ideal transport route for the sand. Similar frack sand mines and processing facilities in the United States have been linked to adverse health impacts to individuals working in the mine and processing facility; individuals transporting the cargo; individuals living near this type of development; and individuals living near transport routes. The potential health and socioeconomic effects to SFN and its members as a result of the Project are unknown at this time and must be studied further.

We require an immediate response from CPS regarding the above noted points.

Mitigation Measures

The Project is a substantial undertaking that will be in operation for 54 years. Table 6-1 as found on page 58 of the EAP indicates that the Project stands to have numerous potential interactions with physical, aquatic, terrestrial, and atmospheric environmental components throughout the construction, operation, maintenance, and decommissioning of the Project. Upon review of the Responses, it is concerning that very important mitigation measures and plans have not yet been developed. The environmental management plans that are to yet to be developed within the "Environmental Management Program" include the following:

- Dust Management Plan
- Air Quality Monitoring Plan
- Erosion and Sediment Control Plan
- Surface Water Management Plan
- Heritage Resources Management Plan
- Groundwater Monitoring Plan
- Revegetation Monitoring Plan
- Emergency Response Plan

The response as provided by AECOM to numerous questions or issues raised by the public relied upon this yet to be developed "Environmental Management Program".

For example, the Responses state that surface waters are “planned” to be fully contained on site and are “not expected” to impact Lake Winnipeg. These preliminary conclusions are based upon mitigation plans that have not been created. These preliminary conclusions are also the basis of AECOM’s determination that Project related activities are not anticipated to interact with fish or fish habitat.

Until the mitigation and monitoring plans listed above are drafted and can be reviewed by the public, the concerns of SFN regarding air quality, erosion and sediment reaching Lake Winnipeg, and impacts to aquatic and terrestrial animals go unanswered.

A similar issue arises when reviewing the Traffic Memorandum included with the Responses as Attachment D. Table 1 of the Traffic Memorandum indicates that there will be a 5-28% increase in Annual Average Daily Traffic due to the Project on roads that SFN members travel on a daily basis. When asked if the existing roads are “good enough” for increased truck traffic or if road safety will be maintained, the Traffic Memorandum states that “CPS is in ongoing discussions with Manitoba Infrastructure to determine possibilities for upgrading provincial infrastructure to accommodate the proposed Project traffic and maintain public safety.”

The EAP and the Responses are leaving much to be developed or addressed in the future. There must be more clarity and definitive plans to ensure that Project related impacts will be adequately minimized and/or mitigated.

Traditional Ecological Knowledge

The response to Wild5 on page 13 of the Responses states that CPS encourages holders of other Traditional Ecological Knowledge (“TEK”) to share their knowledge of the Project Site Area not previously gathered during the Project TEK Study and other community meetings. CPS states that they will work collaboratively with local community members, with input from MBSD, to determine appropriate measures needed to sufficiently mitigate potential Project effects to valued environmental components and specific resources within the Project Site Area not previously identified in the EAP.

Due to the issues raised in Point #1 above, SFN has not been contacted to provide TEK on issues such as moose population in the Project Site Area or along the Project truck corridor that is adjacent to the SFN Reserve. The EAP states that there will be “moderate adverse effects to wildlife” due to the Project. SFN and its members must be able to understand how the Project affects their Aboriginal and Treaty Rights and provide input on those Rights as well.

Moving Forward

SFN is of the view that the Project clearly poses the potential for adverse environmental effects and impacts to SFN's Aboriginal and Treaty rights. Due to the duration and location of the project; further studies, independent expert reports, and adequate consultation are essential for a project of this nature that will have untold long-term effects on the region.

We require that CPS, as the proponent, consult and accommodate SFN in a detailed and meaningful manner as soon as possible and that the Project review be carried out with the utmost transparency with multiple opportunities for SFN and its community members to be informed and to provide traditional knowledge.

We are unsure as to whether Manitoba conducted a preliminary assessment of the impact that the Project would have on SFN's Treaty and Aboriginal rights. If this assessment has been conducted, we once again request that you provide us with same, and if this assessment has not been conducted, we require clarification as to why this has not occurred.

If SFN's concerns are not addressed and reasonable accommodation and mitigation does not occur, then we expect to receive instructions to pursue every remedy available to SFN, including injunction and Judicial review.

Trusting this is satisfactory.

Yours truly,

MYERS LLP

Per:



ALEX J. NISBET

AJN

cc: Chief Derrick Henderson

Winsor, Jennifer (SD)

Subject:

FW: Silica Sand Project

From: Dan Garcea [REDACTED] >

Sent: April-08-19 5:49 PM

To: Winsor, Jennifer (SD) <Jennifer.Winsor@gov.mb.ca>

Subject: RE: Silica Sand Project

Hello. Please accept this letter in opposition of this proposal as it stands until further information can be obtained specifically regarding the transport of product/sand:

There is a lot of information and questions to review on it, but my concern to you at this time is regarding the semi-trailer truck traffic this project will be creating on a very poor and questionable existing Hwy 304. This is a 90% and 65% spring road restricted highway and based on the response in Appendix D and information I have reviewed (Pg 46 cl. 3, 4 &5), I do not see anywhere that CPS inc. has addressed any upgrades, repairs or safety concerns in their response. They note some "possibilities for upgrading prov. Infrastructure" in select locations only. It appears that they have stated that these requirements for the greater length of this highway will be the responsibility of the Province. I frequently travel on this highway and considering it's condition including the curves, un-levelness, unpaved shoulders, narrow width and thin surface it is hard to believe that this will be considered a safe highway to be sharing with semi-trailers passing every 8 min. (noted in response) and that it can withstand this heavy traffic for long before it fails. This includes the section of highway 304 from Hwt #11 until the section of bush ends which has no shoulders and is very winding. I am not against the idea of creating a business that can benefit the residents of this province from a natural resource we are fortunate to have in this province, but the question remains at what and who's expense. We are fortunate to have this highway paved and recently upgraded with drainage culverts, which I'm sure was a very costly project. I understand that these are public highways for all to use, but if the approval of a new and specific company is the sole reason for undisputable damage to this highway, then what recourse will there be once it is approved and too late to regulate beyond what is entitled? If this has been addressed elsewhere or within this information I would like to see where and how, but if not I would hope that there would be a better and safer way to transport all this sand, such as a barge. This would not put the rest of the drivers along this highway at risk for their safety by passing this incredible amount of trucks on such a dangerous highway and not leave the tax payers the burden of having to repair this highway or living with a damaged highway for years until it can be repaired again. I do have more to state on this concern, but would like to leave you with the question of how these concerns would be dealt with and how this is being addressed with the Provincial Dept. of infrastructure and if there are any specific plans on concerns from the department on this proposed project. Thank you for the time to consider this and read my concerns on it.

**Comments on the CPS Response to the TAC and Public Review
of the
Wanipigow Sand Extraction Project 5991**

**By M.J. McCarron
April 3, 2019**

After reviewing Canadian Premium Sand's (CPS) responses to the Technical Advisory Committee (TAC) and public review of the Sand Extraction project comments, several critical issues remain:

I have reviewed the analysis provided by D.M. LeNeveau for What the Frack Manitoba, dated March 31, 2019. Please consider the following comments in addition to the comments submitted by D.M. LeNeveau.

Cumulative Impact – multiple resource extraction projects

Cumulative impacts have increased substantially since the initial reports were made public. Havilah mining has purchased the mineral rights for 53,000 hectares of land to explore, likely beginning this summer. No information has been shared regarding this mining development. Mining claim stakes located on both sides of the Manigotogan River and documentation on the company website indicate the potential for substantial impact on the local environment, compounding concerns regarding the impact of Canadian Premium Sand. There are signs that exploration by Havilah will start this summer. No consultations have been held with any residents from the four Aboriginal communities as far as we know.

The recent granting of an Option License to explore Indigenous-led commercial forestry in the project region also needs to be factored into the cumulative impact of noise, dust, traffic, and additional disruption to habitat, water and air pollution. No longer should CPS be able to claim that their impact on The Community Trapline will be mitigated by the availability of alternate traplines.

In addition to cumulative impacts from these current and future land uses, impact from past natural resource extraction must also be considered. After consulting with traditional knowledge keepers, I learned that the forest canopy has just recovered from a clear cut completed 30-40 years ago to the point that it is finally providing habitat to support mammals and local trapping. I have not seen a reference to the forest regrowth timeline and its influence on the interpretation of wildlife data last collected in 2009. This data is not accurate and does not reflect current wildlife populations. For example, since February, Camp Morning Star occupants have seen 6 moose on the project site. One was a calf suggesting the area may be used of calving. Unfortunately, no current data was collected and the noise from the exploration activities may prevent accurate data collection

I appreciate that CPS has reiterated that they are willing to work with Traditional Ecological Knowledge Keepers in response to my first series of comments on TEK, but a baseline study should have been completed/updated before any exploration permits were given to CPS. The clearing done to date is extensive from a wildlife management perspective, but I hope that does not prevent the Province from requesting further study. It seems that whatever method CPS is using to collect TEK from elders is not working. The information does not seem to represent what actual land users are experiencing.

If Havilah explores for gold, and/or develops a mine in the Manigotogan area as proposed on their website, then all trap lines in the region may be impacted. Previous tailings ponds developed by San Gold have destroyed RTL 11 and a small portion of RTL 12. If the numerous mining and forestry land use projects proposed for this area do end up being developed, trapping as a Treaty Right will very likely be extinguished forever. There will be no accessible land base to support young trappers. The area to be mined for silica sand is a significant and easily accessible learning space for young community members wishing to learn about their cultural heritage. Frontier School Division has just started a back to the land program. Back to what land??? I am really questioning where exactly Treaty 5 members will practice ceremony with noisy machines in the background. If the noise of the finished operation is anything like the noise created by machinery used in the exploration phase, there will be no suitable to practice ceremony. If the rest of the region is going to be developed, then the value of the CPS site as a green space and as a development buffer, increases exponentially.

Traffic

Cumulative impact as described above will also be significant on our highways. There is no work slated for 304 this year, according to the Province. The TAC respondent representing the Eastern Regional Operatives and Highway roadside Development stated that the proposed project may have negative impacts to the provincial highway network. Those impacts will increase substantially if logging trucks are added to the traffic in addition to whatever mining vehicles are required by Havilah mining.

In addition, CPS has stated they used data from 2012 in their traffic studies. The East Side Road has opened since then, so there is significant additional traffic from communities north of Hollow Water First Nation. Traffic is one of the primary concerns of local residents and our concerns have yet to be addressed with adequate information on our highways. We have just learned that the Winnipeg plant does not have a license and so sand will be trucked to the buyers until such time as it satisfies the license requirements. A highway engineer has estimated that each km of road needing to be upgraded will cost between \$700,000 and a million dollars per km. To leave citizens without adequate information on whether this will be addressed by the Province before the project is developed any further, is unacceptable. The Province needs to provide updates and information before a license is granted.

Air Quality

Dr. Lisa Robinson (HSAL) recommended a population survey and map of the human population in the affected area. It should include population and the distance to the quarry processing plant and trucking routes. CPS provided an analysis of four sites, but did not include any sites from Seymourville all the way along the cottage developments and along the Manigotogan River to the bridge. This section along the waterfront and river comprises about 60 percent of the population in the region. Without showing an accurate relationship of the population to air quality factors, the study is misleading.

Using data from International Falls and James Richardson Airport is unacceptable given that readings of particulate matter still exceed acceptable limits. Winnipeg is Canada's 6th largest Lake. Winds are likely to cause the most concern and impact the readings because they travel a long way over this very large body of water. Surely data exists for Canada's 5th and 7th biggest lakes as opposed to International Falls which is number 15 in relative size? Please explain how the study made allowances for the likelihood that the climate was not representative of the project site. As there will be summer populations of over 2,000 people within a few km of the site, a comprehensive study of the population needs to be referenced in any air quality studies. I also question the use of Google maps in the terrain analysis. Only 3% of the terrain was entered in the data set as water, but the effects of the wind over Lake Winnipeg would gain speed over a much more significant area. I am not a scientist, but this study is too critical to human health to shrug off and the large difference in the second set of results raises more questions than answers.

Historic Resources Branch

An archaeologist who has developed a relationship with elders in the community without having to pay them has contacted the Historic Resources Branch as required by the Heritage Resources Act after a brief walk through the site with an elder who pointed out significant findings within and at the edge of the site. Given that Havilah may be doing exploration work in the region very soon, we are extremely concerned that these heritage resources on Treaty 5 Territory be protected before any more exploration work is commenced. Virginia Petch has done quite a lot of work in this area, as has Renee Barker, but there are many sites that have not been documented. Part of that is because elders are really reluctant to share information with outsiders. However, as the company is very open to protecting heritage findings, we will work with the company and the Heritage Resources Branch. This section then, is for information only, to keep both the Company and Province in the loop.

The Historic Resources Branch has indicated they will review the findings of our archaeologist and get back to us. We await their response and will have the archeologist follow the regular protocols with CPS and The Branch.

Forestry

Allowing the disposal of the timber is a positive aspect of the proposal. However, there is concern with the improper stacking of trees when roads and exploratory areas are pushed. Also, large berms with deep trenches have been placed on various access roads. My only comment is that the deep trenches are dangerous for all mammals.

Restoration

Local knowledge keepers are not satisfied that the area can be restored. They are do not buy the restoration plan and are concerned that water seepage, deep excavation, and corresponding contamination from the pits will continue to threaten fish and water. For this reason, The Department of Fisheries and Oceans needs to be involved to study potential contamination and sediment migration. The risk to the commercial fishery and developing sport fishery is too important to ignore. To keep claiming there are no protective measures in place because no fish bearing streams are on the company site and there will be no spills, leaching, or run-off is misleading and ludicrous. While the surface area of the streams and creeks in question do begin just outside the border of the proposed site, the groundwater originates within the site and so any contamination of the creeks leading to the rivers will be connected to mining activities.

Consultation Process under Section 35 – Duty to Consult

Over 100 members of Hollow Water First Nation have, to date, signed a week old petition to confirm that they were not properly consulted under Section 35 and they are not in support of the Wanipigow Sand Project. We will continue to work with the appropriate authorities to protect the human rights of Band members who have been threatened by a CPS employee (the matter was handled by the RCMP. Human Rights complaints may yet be made) and allegedly Chief and Council for expressing their opinion. However, the question must be asked, why are the Chief and Council so against getting a second opinion on the information provided by CPS and the Province? What are they afraid of?

The consultation process is not mutually acceptable based upon the following observations:

Consultations have ended. The rewritten Technical Report has not been made and Hydrogeological reports have yet to be released. How can people be consulted on information and data that does not yet exist?

The Coordinator appointed by the Crown was pro-mining as referenced in Band minutes prior to being contracted for this position. This was not a community driven process, but a company driven process. While the goal of this process is to identify mitigation and accommodation concerns, this lack of transparency is concerning going forward given that Manitoba seems to be on the verge of a mining development boom.

The company has attempted to abrogate Treaty Rights before the release of a License by offering to buy out trappers. CPS should be required to wait until the process is complete and a license has been issued.

At this point, CPS does not have a social license to operate. Very few of the jobs will go to local residents. The truck driving jobs will be contracted out to an outside business already connected to the company, many of the jobs require experience or training not available in the community, and so there will be a few minimum wage positions without lasting benefits to individuals or the company. CPS has stated that they will train individuals as time goes on, but gives no indication of timelines. Are they really going to terminate employment of outside employees within a reasonable time frame? 40 bed man camps are said to be in the works and to be constructed to presumably house truckers and workers. I am dead set against this kind of set-up in small communities. Already one worker has been fired for trolling for young girls. There needs to be a strict memorandum of understanding outlining behaviour if CPS is going to house men away from their families. No alcohol, curfews, and no interacting with anyone under the age of 18. We have had difficulties with CPS employees taking pictures of underage girls.

Given the outstanding issue, the only meaningful review of Canadian Premium Sand proposed frack sand mine is through a public panel review process such as the Clean Environment Commission or a Joint Provincial/Federal Panel Review process under the Canadian Environmental Assessment Act.

Respectfully,

Mary Jane (M.J.) McCarron

[Redacted signature]

Dreyson Smith

Wanipigow, MB

April 8, 2019

Jennifer Winsor, P. Eng.
Environmental Engineer, Environmental Approvals Branch
Manitoba Sustainable Development

**Subject: Proposed Wanipigow Sand Extraction Project (#5991) - Environment Act
Proposal Review**

Dear Jennifer Winsor,

This letter is in response to comments made by Canadian Premium Sand (CPS) as part of the Wanipigow Sand Extraction Project Environment Act Proposal (EAP) Review. The proposed project is calling for the construction of a paved access road within a wetland that links Wanipigow River to Lake Winnipeg, to provide access from the sand mine to PR 304. The bog in question drains into both the Wanipigow River and Lake Winnipeg via three permanent creeks.

CPS inaccurately assumes that the headwater bog crossed by the proposed access road is non-fish bearing despite having only studied the landscape for the purposes of this EAP during extremely dry years with very low water levels and during the fall.

CPS should be required to assess the bog at years of high water, projected 100 year flood levels and be willing to conduct a fish and fish habitat assessment during the spring melt. Several species of fish prefer to spawn on seasonally submerged vegetation in areas that aren't typically fish habitat in the summer, winter or fall - the bog needs to be assessed for spawning habitat in spring due to its connectivity to Lake Winnipeg and the Wanipigow River. The headwater bog needs to be assessed for species of fish that typically inhabit bogs such as the fathead minnow (*Pimephales promelas*), brook stickleback (*Culaea inconstans*), pearl dace (*Margariscus margarita*), central mudminnow, white sucker, redbelly dace and the finescale dace. These species of fish are well known for inhabiting headwater bogs, black spruce muskegs and have even been found in isolated wetlands (The Freshwater Fishes of Manitoba, Stewart and Watkinson). CPS should not be allowed to build a road through a headwater bog that is connected to both Lake Winnipeg and the Wanipigow River without provincial and federal Environmental Assessments.

Previous comments made by CPS regarding my original letter are dismissive and skirt the issue entirely. **My main concern is that the headwater bog IS fish bearing habitat as CPS has only assumed that it is not fish bearing without a proper assessment. CPS has not done a Fish and Fish Habitat Assessment under the DFO Fisheries Protection Program and they should be required to do so given the headwater bog's connectivity to Lake Winnipeg and the Wanipigow River (fish bearing and critical habitat for a legally protected Endangered Species).** Completing a Fish and Fish Habitat Assessment under the DFO Fisheries Protection Program for this project would demonstrate good environmental practice on CPS' part and is a reasonable requirement in this situation. Failure to conduct a Fish and Fish Habitat Assessment under the DFO Fisheries Protection Program where the access road crosses the headwater bog would be negligent on CPS' part and on the part of the Minister of Sustainable Development for not requiring it.

Construction of a culvert in the headwater bog will require berming the area to allow for dry installation of the culvert, this will result in decreased water flow, sediment release and potentially fish and fish habitat damage. None of these issues can be mitigated unless CPS is required to report the project to the DFO Fisheries Protection Program.

For all of 2019, CPS has been pushing forward with activities under Crown Lands Act Work Permit for Exploratory clearing. Exploratory clearing covers clearing of approximately 10 meter wide trails meant to supply access for geotechnical investigation. CPS has begun clearing much larger areas and corridors that are estimated to be over 60m wide in some areas. This clearing is not covered under the Exploratory clearing Work Permit and is likely a violation. Photos attached demonstrate that CPS is clearing the large areas for purposes of the construction of a "wet plant" and a "dry plant" - these activities would not be covered under an exploratory clearing Work Permit. It would appear that CPS is willfully violating the conditions of a Work Permit for exploratory clearing by clearing for construction purposes (the "dry plant" and "wet plant").

It is speculated that CPS is clearing for construction purposes at the present time in order to complete construction clearing before April 30th, when clearing activities cease until September to provide protection for nesting migratory birds. Completing the clearing for construction activities under a Work Permit granted for Exploratory Clearing activities only (a clear violation unless a Work Permit for Construction has been issued), would allow for CPS to continue with the plant construction throughout the summer. The legal and environmentally sound action would have been to delay construction clearing until the appropriate Work Permit had been issued under the Crown Lands Act. By conducting clearing activities for construction purposes under a Work Permit issued for Exploratory Clearing, CPS demonstrates that they are willing to circumvent Manitoba's laws and environmental protection legislation.

Please consider the information presented and require that the Canadian Premium Sand (previously Claim Post Resources) submit the Wanipigow Sand Extraction Project for DFO

review under the Fisheries Protection Program, thus requiring CPS to complete a provincial and federal Environmental Assessment.

Completing these environmental assessments are necessary in order to legally obligate CPS to monitor long term wildlife, air quality and other environmental effects that may result from the project. Should health effects in local residents appear or drastic environmental changes occur as a result of this proposed project, the environmental assessments and resulting monitoring programs will help ensure CPS is held legally accountable.

My concerns over this project grow daily as CPS continues to demonstrate a lack of respect for the local community members by dismissing legitimate concerns over health and environment. CPS does not care if local community members develop silicosis as a result of their project because they are not legally required to care.

Sincerely,

Dreyson Smith





Winsor, Jennifer (SD)

From: Marvin Koop [REDACTED]
Sent: April-08-19 8:16 AM
To: Winsor, Jennifer (SD)
Subject: Re: Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project - Environment Act Proposal Public Review - File No. 5991.00

Dear Ms Winsor, I am grateful for your role in promoting public awareness and participation in the EAP process for the Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project. I do think that the mandated public meeting scheduled by CPS for April 11th, 1800 - 2000, will be insufficient to adequately cover all of the issues of concern to the people who will be affected by this proposed project. Some of my neighbors at Pelican Inlet have indicated that the location and timing will very likely mean they will be unable to participate, so my first point would be to request consideration for your office to require an additional public meeting in Winnipeg, specifically for stakeholders who are resident in Winnipeg to benefit from this opportunity for further explanation of the EAP response by CPS and to have their questions and concerns answered.

With respect to the Public Registry File: 5991.00 - **Canadian Premium Sand Inc.** - Wanipigow Sand Extraction Project, I continue to have some of the same concerns raised in my earlier submission, regarding:

a. the issue of impact on the water table and the viability of our boreholes for our cabin, and how the province would protect that resource from negative impact by the proposed project; a specific concern and enquiry would be to how the province could issue a license to proceed without sufficient hydrogeological studies being carried out and the results being provided to the stakeholders that would also include the issue of impact on existing potable water boreholes as well as those which would be constructed in the future for further cottage development in our community ? In addition, it appears that the company intends to utilize water from local community sources for 'top-up' when needed, but the only sources available would appear to be from HWFN drawing water from the Wanipigow River near to its entry into Lake Winnipeg or from Seymourville which would be a direct extraction from Lake Winnipeg, in both instances apparently utilizing water from the lake or from an immediate and important source of water inflow into the lake.

b. the impact of the dust, noise, erosion, groundwater (as above) and revegetation on local residents including our cottage development - the CPS response indicates that "CPS is developing an Environmental Management Program, which will be applied during construction and/or operation of the facility, as required. Environmental management plans proposed to be included within the Environmental Management Program are as follows:

• Dust Management Plan • Air Quality Monitoring Plan • Erosion and Sediment Control Plan • Surface Water Management Plan • Heritage Resources Management Plan • Groundwater Monitoring Plan • Revegetation Monitoring Plan • Emergency Response Plan "

Why are these plans (at least in draft format) not a requirement component of the EAP submission, so that they can be evaluated for effectiveness and be in place for accountability from the outset of construction of the project infrastructure and the mining and transport of the sand ?

Do the CPS plans for monitoring include locations in our community and other cottage developments who are in close proximity to the proposed extraction ? What is the requirement for full , transparent

and timely disclosure of the monitoring results, by the company, to the public during the construction of the plant infrastructure and the proposed 50 years of operations ?

c. I have serious concerns about the validity of the company reclamation proposals, as they indicate there will be excavation to a depth of 10 - 30 meters - and I would expect (hope) that the (draft) reclamation plan would also be a required component of the EAP submission to be evaluated by experts ahead of a license being granted, and to ensure an competent accountability process was in place, as well as an evaluation of the bond required to ensure that reclamation does not end up being a taxpayer funded program 50 years from now.

Finally, we are apparently already seeing the negative impact of the project on local wildlife, as a few weeks ago, a number of bald eagle couples had returned to their normal home and nesting locations, and were regularly spotted overhead and on the lake. However, they are no longer visible in our community and I believe that is likely due to the noise levels of the construction equipment and the widespread destruction of the trees that is being carried out in the proposed project area ahead of the license being granted. It does appear that the current removal of forest vegetation and mature trees is very very much in excess of what was presented as the minimal required for access roads and cutlines to carry out the technical investigations. I fear that this will be a permanent and expanding negative effect of the project, which will also likely affect many other species of birds and mammal population if and when this project goes forward.

Thank you for your kind consideration in this important matter.

regards

Marv Koop
Pelican Inlet resident

On Thu, Mar 14, 2019 at 10:44 AM Winsor, Jennifer (SD) <Jennifer.Winsor@gov.mb.ca> wrote:

Good morning,

Thank you for participating in the environmental assessment public review process for the Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project Environment Act Proposal (EAP). The information you provided, along with other public and Technical Advisory Committee (TAC) comments, was sent to the proponent for their response.

The response from the proponent is now on the Public Registry and can be reviewed here:
<https://www.gov.mb.ca/sd/eal/registries/5991wanipigow/index.html>.

If you have further questions and/or comments regarding the proponent's additional information provided, please send your comments in writing (email or letter) to my attention on or before **April 8th, 2019**.

Best regards,

Jennifer Winsor, P.Eng.

Environmental Engineer

Environmental Approvals Branch

Winsor, Jennifer (SD)

From: Dennis LENEVEU [REDACTED]
Sent: April-06-19 10:03 PM
To: Winsor, Jennifer (SD); chelsea.fedrau@canada.ca
Cc: Don Sullivan; Douglas Tingey
Subject: Disposal of Pyritic shale for Wanipigow Sand Extraction Project

Dear Jennifer

I have uncovered new information regarding the Proponent plan for disposal of pyritic shale. The Proponent states in response to reviewer comments,

“In the areas where the shale layer is encountered during extraction, the shale will be isolated and extracted separately, placed in a prepared clay lined pit at the floor of the current active extraction area and capped with limestone prior to further containment in the restoration process. This is the environmentally accepted process to both permanently neutralize potential acid forming iron elements in the minerals as well as isolate the material from the environment”

I have previously reported that the clay liner used to contain the pyritic shale in the quarry pit may be subject to acid degradation.

(https://www.researchgate.net/publication/256382859_Acid_induced_degradation_of_the_bentonite_component_used_in_geosynthetic_clay_liners).

I now have information that the limestone roof is susceptible to being coated with insoluble calcium salts generated in the neutralization of the acid. This coating will render further neutralization of acid ineffective (<http://www.phadjustment.com/TArticles/Limestone.html>).

The design of the clay-lined pit is flawed because the pit will be subject to a fluctuating water table allowing exposure to air and subsequent generation of acid. The pit will flood during heavy rains or spring run-off allowing the acid to overflow and be subject to offsite drainage. After some time the limestone roof will no longer be effective in neutralizing any acid overflow. Degradation of the clay liner from acid exposure will allow leakage of the acid outside the pit. Acid that overflows and leaks may eventually drain into nearby the fish bearing waters of Lake Winnipeg, Wanipigow River, and Manigotagan Mouth.

The shale segregated from the overburden will be likely be stockpiled until such a time as the clay pit is constructed and ready for disposal. The stockpiles will be exposed to air and moisture from rain enabling the formation of acid that will drain from the stockpiles and potentially to nearby fish bearing waters.

It is conceivable that the shale will be kept dry or submerged until emplacement in the pit. How?

Other potential operational difficulties have not been explained such as how the shale will be separated from the rest of the overburden. If not separated and all the overburden is placed in the clay-lined pit, how will the remainder of the excavated cell be backfilled? If the shale is segregated there might not be enough remaining overburden to backfill.

Is the shale too hard to be bulldozed? Will blasting be required or specialized rippers? Will the shale need to be pulverized to emplace in the clay lined pit? What are the respirable dust consequences of shale removal and pit emplacement?

Where will the clay and limestone come from and how will it be transported? How much clay will and limestone will be required?

The Proponent although acknowledging the presence of sulphide bearing (pyritic) shale in the overburden does not admit the existence of pyritic oolite and pyrite in the raw sand in the deposit that have been documented in the 2014 NI 43-101 technical report. Pyritic oolite and pyrite in the raw sand will be removed in the wash plant. Overburden material other than shale may also contain sulphide or heavy metals that might be released by acid drainage. It is imperative that all the overburden and rejects from the wash plant be analyzed for the presence of heavy metal and sulphide as part of the environmental assessment.

The Proponent has stated in the EAP that site drainage will be managed to direct run off to nearby low areas.

Section 6.3.1 of the EAP states,

“Construction of culverts along Project access roads, as required, will assist in directing runoff flow and maintaining natural drainage pathways through low areas such as bogs.”

These low areas drain into the surrounding waters of Lake Winnipeg, Manitotagan Mouth or the Wanipigow River providing a pathway for the acid to enter fish bearing waters.

The conventional method of dealings with sulphide bearing tailings is to immediately sequester them below the water table preventing exposure to oxygen. For instance in the Lalor Lake Mine in Snow Lake the tailings are piped to an impoundment area where they are permanently submerged. (<https://ceaa-acee.gc.ca/050/documents/p80047/90345E.pdf>)

A joint provincial and CEA assessment is required to ensure the proper identification, management and disposal of sulphide and heavy metal in the overburden and wash plant rejects.

Sincerely,Dennis LeNeveu

Winsor, Jennifer (SD)

From: Lonny Karlenzig [REDACTED]
Sent: April-06-19 8:25 PM
To: Winsor, Jennifer (SD)
Subject: Wanipigow Sand Project

Good day, my name is Lonny Karlenzig, I live in Manigotagan, MB.

It has become increasingly clear to me that this process of public consultation in which the public writes to comment on the proponent's EAP is just a formality. Issues are presented, mitigation measures are advised and I feel there are no issues that could be raised that AECOM and Canadian Premium Sand will not somehow mitigate in favour of this project.

So I'd like to bring this to the attention of AECOM, Canadian Premium Sand as well as Manitoba's Department of Sustainable Development. This project is not the only one that will be affecting the communities of Manigotagan, Seymourville, Hollow Water First Nation and our smaller seasonal communities.

Havilah Mining Corporation has recently staked mining claims throughout all of Manigotagan and around HWFN. Private lands, crown lands, everything. We the residents have no recourse, while we may own the surface rights, the crown is in possession of the mineral rights and they have sold them out from under us.

Havilah Mining Corporation now controls 430 square kms of claims, they plan on exploring to find the most lucrative ore bodies, to extract the gold rich ore and truck it to Bissett for processing. It's in their Ni-43-101 report. This will go on for much longer than the Wanipigow Sand Project, gold exploration has been happening in our area since it's discovery in 1911 but on a smaller scale. That will soon change.

The cumulative effects of the Wanipigow Sand Project and the gold mining destruction to this area will be enormous. There is no way to mitigate the damage these activities will cause to our communities, the land, the water or the wildlife over the long term. These projects will effectively destroy the indigenous way of life for Hollow Water First Nation. Don't forget Lake Winnipeg is dying and the Government of Manitoba knows this, that's why they are offering to buy fishing quotas from the commercial fishermen who make a living on the lake.

So while this process focuses on this one project and its effects, it fails to consider the bigger picture.

I don't have any comments for AECOM or CPS, my comments are directed solely at the Department of Sustainable Development.

Read over the Minister's message on the department's website, there is no such thing as sustainable mining or quarrying. It takes so much from the earth and gives hardly anything back.

I've included a photo of the iMaQs map showing the accurate representation of the mining claims in the area, AECOM really does a good job at missing information. The claims in Manigotagan were filed in January, 2019. AECOM is either the worst consultant I've ever seen or seriously dishonest along with Canadian Premium Sand.

Winsor, Jennifer (SD)

From: Robert Fenton [REDACTED]
Sent: April-06-19 1:04 PM
To: Winsor, Jennifer (SD)
Subject: Re: Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project - Environment Act Proposal Public Review - File No. 5991.00

Further on this file.

The commentary by D.M. LeNevue raises many concerns that are beyond my competence. I do believe they need to be considered very carefully and CPS must provide answers before any permit is granted.

I was struck particularly by several items that are relevant to my earlier concern about surface and ground water:

1. Introduction

*Information about impact of the Project on local water wells, wet areas, water bodies, reclamation efforts, sediment migration and acid drainage from local pyrite cannot be properly assessed without a completed hydro-geological report. **This report is not planned until after the environmental assessment and permitting is finished.***

2. Technical NI 43-101 Report and a Detailed Hydro-Geological Report Required for Water Supply and Local Effects Information

The hydro-geological assessment must be thorough and include studies for sediment discharge to the two unnamed creeks south of the project and to the Manigotagan, Wanipigow Rivers and to Lake Winnipeg. The effect of site drainage on run off and sediment discharge and the effect on local wells and water table must be evaluated. The topological disturbance from sand removal must be taken into account and the effect on potential reclamation.

4. Fish and Fish Habitat

CPS dismisses the Project effect on fish by stating in response to a comment by What The Frack Manitoba, "No potentially fish bearing waterbodies occur within or immediately adjacent to the Project Site Area. Therefore, fish bearing waterbodies are not expected to be adversely affected by Project-related activities. there is no fish bearing habitat in the plant boundaries." This statement borders on absurdity. The entire Project area is an elevated peninsula that will drain to the water bodies on three sides that are fish bearing.

What caught my attention is that my well and my neighbours wells are downhill of that elevated peninsula and will receive much of the drainage from the project. Ground and surface water protection is of paramount importance. The whole focus of my life at Pelican Inlet is Lake Winnipeg significant detrimental effects to the Lake must be avoided. The potential for those effect lilely warrants a federal review process.

The managers of this project seem to have no long term commitment to the project area or the province. This is of great importance for the issue of long term enforcement that I raised in my first comments. I have not

seen any references to similar projects that the team have completed and followed through to the restoration stage. Nor have there been any testimonials to the satisfaction of local interest groups with the managers' performance elsewhere. I know there is previous experience because they tout it on their consulting firm's website.

I spent several years on Tembec's Sustainable Forestry Advisory Committee. I know first hand the amount of planning and consultation that went into their forestry plans. The planning and consultation efforts by CPS do not compare at all to those of Tembec. Tembec only wanted to harvest the trees not rip the land apart.

A single public consultation meeting in Seymourville on a Wednesday is not adequate particularly when so many stakeholders will be unavailable for such a meeting. I myself hope to be there if my schedule permits. Twelve days notice is not adequate for many whom would wish to attend.

Thank you Bob

From: Winsor, Jennifer (SD)

Sent: March 14, 2019 10:43 AM

To: Winsor, Jennifer (SD)

Subject: Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project - Environment Act Proposal Public Review - File No. 5991.00

Good morning,

Thank you for participating in the environmental assessment public review process for the Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project Environment Act Proposal (EAP). The information you provided, along with other public and Technical Advisory Committee (TAC) comments, was sent to the proponent for their response.

The response from the proponent is now on the Public Registry and can be reviewed here:

<https://www.gov.mb.ca/sd/eal/registries/5991wanipigow/index.html>.

If you have further questions and/or comments regarding the proponent's additional information provided, please send your comments in writing (email or letter) to my attention on or before **April 8th, 2019**.

Best regards,

Jennifer Winsor, P.Eng.

Environmental Engineer

Environmental Approvals Branch

Department of Sustainable Development

1007 Century Street

Winnipeg, MB R3H 0W4

Ph: 204-945-7012

Fax: 204-945-5229

Winsor, Jennifer (SD)

From: Walter Keller [REDACTED]
Sent: April-02-19 1:20 PM
To: Winsor, Jennifer (SD)
Subject: Wanipigow Sand Extraction Project

Follow Up Flag: Follow up
Flag Status: Flagged

Dear MS Winsor,

the following is our reaction to the CPS Response to the TAC and public review of the above noted project:

As Manitobans and Cottage lot owners we expect our government to keep us and our environment safe from life threats resulting from commercial/industrial operations.

We take exception to the fact that as cottage lot owner we never had the opportunity to attend a public hearing on this matter and must learn of the facts in connection with this project from

other sources!

After having studied the CPS response at length, it becomes quite clear that the proponent is not willing to clearly state its proposed actions and is avoiding or deflecting answers to important and

legitimate questions from the TAC and other interest groups such as ourselves.

Our position on this matter is identical to the one stated by D.M. LeNeveu of What The Frack Manitoba Inc. in a report dated March 19 2019 and forwarded to your office.

We firmly believe that the government must critically assess all risks involved : human health and safety, environmental degradation, degradation of existing public infrastructure, negative impacts on traditional and communal life etc..

These considerations must supersede taxation revenue ,local jobs , political gains and corporate wealth!

To make an informed and critical decision on this project the regulator needs accurate and honest answers on all questions posed. It is very clear that the proponent is unwilling to

answer these questions truthfully fearing the financial risks and obligations resulting from these answers.

It therefore is unavoidable that an in depth environmental assessment be conducted by the authorities and that the federal government be involved in a joint Federal/Provincial public panel review

Winsor, Jennifer (SD)

From: [REDACTED]
Sent: April-01-19 8:42 AM
To: Winsor, Jennifer (SD)
Subject: Wanipigow Sand Mine

Follow Up Flag: Follow up
Flag Status: Flagged

My name is Lisa Raven, I'm a full time resident and band member of Hollow Water First Nation, MB. and I oppose the Wanipigow Sand Project.

I'd like to remind the Department of Sustainable Development of their mandate as pointed out by Minister Rochelle Squires on their website.

"As Manitoba's Minister of Sustainable Development, I am pleased to welcome you to the department's website, your guide to our work in protecting and preserving Manitoba's environment and natural resources, including fisheries, forests, parks, wetlands, waterways and wildlife. Our team is responsible for developing and delivering programs and services that ensure a healthy, beautiful environment for Manitobans to enjoy now, and for generations to come. You will learn more about our department's ongoing efforts in these critical areas of public service, as well as how each of us can contribute to a cleaner, greener planet for us all." - Honourable Rochelle Squires, Minister's Message - <https://www.gov.mb.ca/sd/about/minister/index.html>

Nothing about the Wanipigow Sand Project or the oil and gas industry it will serve as represented by Canadian Premium Sand's website, can possibly be considered sustainable.

1) The project will remove 1 million tons of sand annually from our communal backyard and ship it to oil and gas producing areas to be used in hydraulic fracturing of fossil fuel wells in other people's backyards. Sand is non renewable as are fossil fuels.

2) Forests will be clear cut, woody debris and fossil fuels will be burned contributing to air pollution, approximately 353 hectares of land encompassed by our communities will be permanently altered, surface and groundwater drainage will be permanently altered, lives will be put at risk needlessly, wildlife will die or be displaced needlessly.

3) The socioeconomic benefits are unsustainable, the jobs are too few when compared to the area's population and have no long term health or financial benefits. After the proposed 54 year life of the project, the jobs will be gone along with the financial gains experienced with them but the adverse effects will remain for our area.

As you can see the Wanipigow Sand Project does nothing to contribute to the vision of Manitoba's Department of Sustainable Development nor does it look to future generations beyond the lifespan of the project. It is short sighted and regards only the financial gains and interests of it's investors/directors and perhaps the current ruling governments of the affected areas.

I encourage the Department of Sustainable Development to halt and reject the licensing process for this project and all projects like it. These devastating short term projects in environmentally sensitive areas of our province have a cumulative effect, each one adds to the destruction of our ecosystems. While some provide much needed long term benefits such as reliable hydro electricity to our communities others just serve to reap the resources and then disappear. Just look at the historic mining and timber industries in eastern Manitoba, they are perfect examples.

Winsor, Jennifer (SD)

From: Lonny Karlenzig [REDACTED]
Sent: April-01-19 7:44 AM
To: Winsor, Jennifer (SD)
Subject: Wanipigow Sand Project

My name is Lonny Karlenzig, I'm a full time resident of Manigotagan, MB. and I oppose the Wanipigow Sand Project.

I'd like to remind the Department of Sustainable Development of their mandate as pointed out by Minister Rochelle Squires on their website.

"As Manitoba's Minister of Sustainable Development, I am pleased to welcome you to the department's website, your guide to our work in protecting and preserving Manitoba's environment and natural resources, including fisheries, forests, parks, wetlands, waterways and wildlife.

Our team is responsible for developing and delivering programs and services that ensure a healthy, beautiful environment for Manitobans to enjoy now, and for generations to come. You will learn more about our department's ongoing efforts in these critical areas of public service, as well as how each of us can contribute to a cleaner, greener planet for us all." - Honourable Rochelle Squires, Minister's Message -

<https://www.gov.mb.ca/sd/about/minister/index.html>

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Regards,
Lonny Karlenzig

What The Frack Manitoba Comments on the CPS Response to the TAC and Public Review of the Wanipigow Sand Extraction Project

**By D.M. LeNeveu, B. Sc. (Hons), M. Sc., B. Ed.
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1. Introduction

The Canadian Premium Sand (CPS) responses to the Technical Advisory Committee (TAC) and public review of the Wanipigow Sand Extraction project are extensive and attempt to address all comments. Nevertheless many outstanding critical issues remain. With the exception of a revised air dispersion study, a traffic memorandum, a cumulative effect report, and a revised GHG calculation in response to a Canadian Environmental Assessment (CEA) Agency request for GHG for the construction and decommissioning phase, little new information has been provided. Even this new information is rudimentary. The cumulative effects does not consider the new forestry development plan in the region for the dubious reason that there is no guarantee that it will progress beyond the option licence issued. Nor is there any analysis by CPS in its EAP of the potential cumulative impacts associated with new exploration activities now underway in the area by the new owners of the Bissett mine. The traffic memorandum does not include an analysis of increase of injury and death from the traffic accidents related to the Project and the cost of increased road maintenance. The analysis of death and injury based on statistics from oil trucks in North Dakota supplied in What the Frac Documents was not mentioned, or applied to this Project. The revised air dispersion study still indicates exceedances of allowed levels in nearby communities and still does not take into account major dust sources documented by What the Frac especially from the three large 70 meter high sand stockpiles shown in a process flow sheet of the EAP.

A more fundamental concern is the environmental impact of the Project cannot be properly assessed without a thorough and complete technical analysis of the Project including engineering specifications on the basic size of the facility and the equipment including all vessels and storage bins in the wet and dry plants and the quarry area. This information will not be supplied until the publication of a new NI 43-101 Technical Report anticipated later this year. Without the up to date NI 43-101 report fundamental information necessary to assess the environmental impact such as the production capacity, volume of water required to charge the wet plant, volume of the mud pit and water pond shown in the EAP process flow sheets, site drainage design, and Project power line design is missing or unsupported.

Information about impact of the Project on local water wells, wet areas, water bodies, reclamation efforts, sediment migration and acid drainage from local pyrite cannot be properly assessed without a completed hydro-geological report. This report is not planned until after the environmental assessment and permitting is finished.

A proper environmental and health and safety assessment cannot be carried out without basic Project information that will not be available until completion of the technical report and hydro-geological study.

Many inconsistent responses by the proponent were given to reviewers comments. For instance, in response to What the Frack Manitoba comments CPS has stated that the wet plant will not shutdown in winter and thus not require drainage of process water and recharging in the spring. This is inconsistent with industry practice in Minnesota and Wisconsin and inconsistent with information from the 2014 previous NI 43-101 technical report. It is inconsistent with the an EAP process flow diagram that shows three 70 meter high sand stockpiles required to supply the dry plant during a winter shut down of the wet plant. It is also inconsistent with the sand deposit being below the water table preventing winter excavation. The important issue of

winter wet plant shutdown cannot be resolved without complete engineering and plant operation specifications that will not be available until the new NI 43-101 is completed.

The production rate of one million tonnes per year given in the EAP is inconsistent with information given to potential shareholders that there is an estimated 372 million tonnes of sand in the Project area (https://www.canadianpremiumsand.com/images/Claimpost_FracSand_Presentation_DISPLAY_v3-21.pdf). At a production rate of one million tonnes per year the acquired asset would never be fully exploited.

The revised GHG calculations in response to the CEA Agency request are inconsistent with the calculations in the EAP that give much higher emissions attributable to the sand haul trucks,

Statements about production and related information such as truck traffic flow are not defensible until completion of the up to date NI 43-101 technical report.

Management plans submitted in the sedar.com site show that CPS is subject to financial pressures to minimize cost of health and safety programs and environmental protection.

The Project must undergo a joint federal and provincial assessment to ensure adequate environmental protection and health and safety measures are taken.

Outstanding issues that have been minimized or avoided that must be fully addressed are outlined below.

2. Technical NI 43-101 Report and a Detailed Hydro-Geological Report Required for Water Supply and Local Effects Information

An up to date NI 43-101 technical report, a completed hydro-geological study and a complete mineral analysis of all the overburden and shale and wash plant rejects are required for a proper environmental impact study. Requirements for make up water supply and the local effects on well water and nearby water bodies and wetlands cannot be adequately assessed and comprehensive remediation planned without the hydro-geological study and the updated NI 43-101 technical report.

CPS states that process water will not be discharged yet it will be present in the mud rejects from the thickener tank that will be disposed of in a mud pit according to a process flow chart in the EAP. The size and location of this mud pit is not given and will be unknown until the technical report and engineering specifications are produced. The process flow chart in the EAP shows a water pond even though CPS in its reply to What The Frack Manitoba comments state there are will be no settling ponds. This contradictory information cannot be resolved until the NI 43-101 technical report is produced.

As mentioned in the introduction, CPS states the wash plant will be run all winter even though this is contrary to industry practice in Minnesota and Wisconsin and there will be no raw sand feed from the quarry that is below the water table preventing winter extraction (<https://superior-ind.com/testimonials/soaring-silica-sand/>). A process flow sheet in the EAP shows three 70 meter high sand piles that would be used to supply the dry plant during winter shut down of the wash plant contradicting the CPS assertion that the wash plant will be operational year round. Winter operation information is critical to evaluate water requirements and the local hydrogeology. It is also necessary to determine the fate of process water during winter shut down of the wash plant and requirements for wash plant recharge if in fact it is shut down which still cannot be determined conclusively despite CPS statements.

The hydro-geological assessment must be thorough and include studies for sediment discharge to the two unnamed creeks south of the project and to the Manigotagan, Wanipigow Rivers and to Lake Winnipeg. The effect of site drainage on run off and sediment discharge and the effect on local wells and water table must be evaluated. The topological disturbance from sand removal must be taken into account and the effect on potential reclamation. A comment by John Neufeld that the remediated area will become an undrained slew was answered by CPS as follows,

“The characteristics of these materials and the non-disturbed materials surrounding the quarry are free draining and will allow for water to continue to flow naturally and not accumulate within the reclaimed quarry”

This statement must be supported by a hydro-geological study to be credible.

3. Iron Pyrite and Metal Presence in Overburden, Shale, and Raw Sand

The required hydro-geological study is intimately linked to the lack of proper consideration of iron pyrite management in the proponent EAP and the proponent responses to comments. CPS has acknowledged in its response to reviewer comments the presence of pyrite and metal content of local shale as identified by both What The Frack Manitoba and the TAC. Metal content and pyrite was not mentioned in the EAP. In its response to reviewer comments CPS states,

“In the areas where the shale layer is encountered during extraction, the shale will be isolated and extracted separately, placed in a prepared clay lined pit at the floor of the current active extraction area and capped with limestone prior to further containment in the restoration process. This is the environmentally accepted process to both permanently neutralize potential acid forming iron elements in the minerals as well as isolate the material from the environment”

This procedure needs further analysis and expert evaluation and review by provincial and federal authorities. What The Frack Manitoba documents CEAA assessments in Rainy River and elsewhere describing requirements for managing pyritic tailings that are more comprehensive than the measures suggested by CPS. CPS does not mention measures to prevent acid rock drainage in the stockpiled shale awaiting disposal in the clay lined pit. Also all the overburden might contain pyrite that may have migrated from the shale. All the overburden must be analyzed for heavy metal and iron pyrite content. CPS has stated in its response to What The Frack Manitoba comments,

“A geochemical characterization program will be developed according to industry best practice for metal leaching/ acid rock drainage (ML/ARD) characterization and management under the supervision of a hydrogeologist and geochemist.”

This characterization must be done prior to the environmental assessment as a necessary prerequisite. The EAP is incomplete without this characterization and should not be allowed to stand as is.

CPS has stated in its response to What The Frack Manitoba,

“Chemical analysis of samples collected from the sand layers confirm that the target sand layer does not contain minerals having the potential to produce ARD. The layer below the sand is the granite bedrock which also contains no acid generating minerals. The layer below the sand is the granite bedrock which also contains no acid generating minerals.”

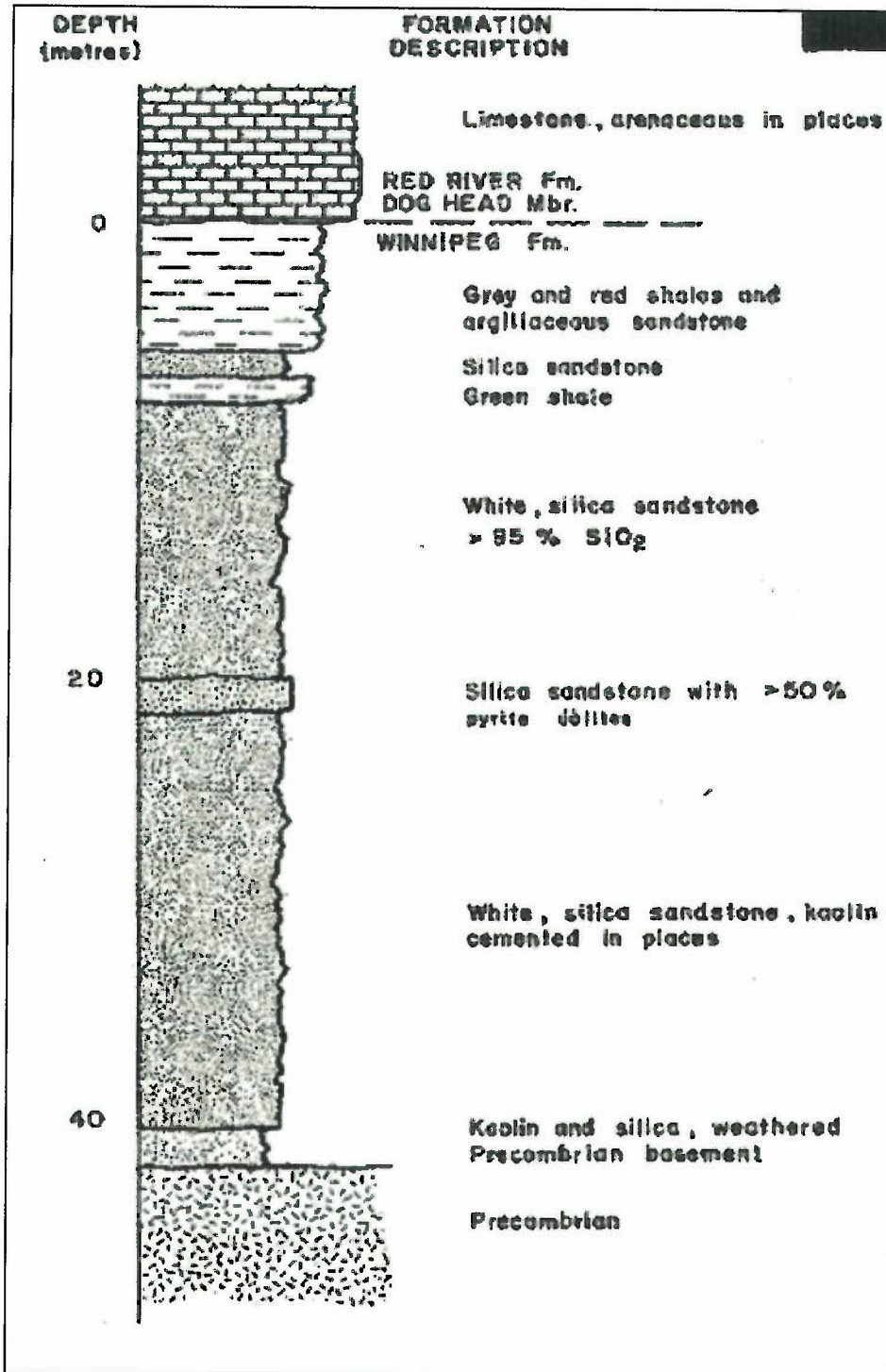
This statement contradicts information in the 2014 NI 43-101 that the major impurity in the sand layer is iron pyrite and that an acid base accounting test showed a NP/AP ratio of less than one indicating the potential for acid leaching. Of great concern is that the pyrite impurity in the sand will be removed in the wash plant and be present in the rejected material that will be stockpiled and disposed of on site and thereby subject to acid drainage. This potential must be thoroughly investigated and not dismissed as CPS has done. The acid base accounting test and raw sand pyrite content documented in the 2014 technical report are still valid. These tests and analyses have been certified by third party experts and are not subject to dismissal in this fashion.

The statement dismisses the comments from What The Frack Manitoba about the presence of pyritic oolite underlying a portion of the sand layer.

The 2014 NI 43-101 technical report in Section 7.2 states,

“ In the Seymourville area, the Winnipeg Formation consists of fine white loosely cemented sand, overlying the pyritic oolite layer, and a basal layer of silica sandstone.”

The pyritic oolite layer illustrated in **Figure 1** below taken from the 2014 NI 43-101 technical report is another source of pyrite that CPS has not acknowledged.



(Source: Watson, 1985)

Figure 1. Illustration of pyritic oolite and shale in the Wanipigow sand deposit

The pyritic oolite would likely appear in the rejects from the wash plant and be emplaced in the reclamation area where it would be subject to water and oxidation to form acid. There is no mention of sequestering this

source of pyrite in a clay lined pit or any other safe disposal method or even an acknowledgement that this pyritic oolite exists. The 2014NI 43-101 technical report may be outdated but the geology has not changed.

The clay lined pit at the floor of the excavation area for pyritic shale containment may well be subject to water table fluctuations and dry out after closure. The clay may crack when dry, allowing for migration of trapped water out the floor and subsequent discharge of acid and heavy metals. The clay itself according to peer reviewed study will deteriorate when exposed to acid from oxidation of the iron pyrite within the pit and eventually leak.

(https://www.researchgate.net/publication/256382859_Acid_induced_degradation_of_the_bentonite_component_used_in_geosynthetic_clay_liners).

Pyritic shale disposal in a clay lined pit in an elevated area surrounded by fish bearing waters is an environmentally risky disposal method. Trucking to a more appropriate site should be required.

The overburden other than the shale might have iron pyrite and heavy metals such as arsenic and manganese as is commonly present in Manitoba black shale deposits (Open File Report OF98-2 Fedikow et. al.). A chemical analysis of all of the overburden is required. Trucking of overburden, shale and sand rejects to a safe disposal site may be necessary rendering the entire reclamation plan unfeasible.

The logistics of emplacing the shale in a on site clay lined pit has not been detailed by CPS. CPS has stated in its comments that the shale may be present in 20% of the deposit. This is a significant amount. How much clay will be required for the pit and where will it come from? What is the resulting increase in truck traffic and highway accidents? What are the implications to drainage and reclamation with a large area underlain by clay lined pit with a limestone roof? What is the lifetime of such an engineered structure? How soon before acid contained in the pit deteriorates the clay resulting in leakage?

The iron pyrite will present a potential danger for acid drainage far into the future as the clay liner deteriorates from acid exposure, weathering, and cracking from dry and wet cycles.

The iron pyrite and heavy metal issue has not been given proper assessment and attention and was ignored in the EAP. It was only after comments from the TAC and What The Frack Manitoba that the issue was acknowledged by CPS. The few words describing disposal of the shale in an onsite clay lined pit are inadequate. The entire plan must be reviewed and approved by experts from Fisheries and Oceans Canada (DFO) and the Manitoba Mines Branch. CPS has demonstrated lack of due diligence and cannot be trusted to deal with this issue adequately.

4. Fish and Fish Habitat

CPS dismisses the Project effect on fish by stating in response to a comment by What The Frack Manitoba,

“No potentially fish bearing waterbodies occur within or immediately adjacent to the Project Site Area. Therefore, fish bearing waterbodies are not expected to be adversely affected by Project-related activities. there is no fish bearing habitat in the plant boundaries.”

This statement borders on absurdity. The entire Project area is an elevated peninsula that will drain to the water bodies on three sides that are fish bearing.

CPS states in their response to reviewer comments,

“During access road construction, culverts will be installed as required to assist in directing runoff flow and maintaining natural drainage pathways through low areas such as bogs.”

Site drainage to low areas such as bogs may increase the rate and magnitude of natural run off and may lead to sediment discharge and discharge of acid and heavy metals from pyrite leaching and flocculants from the disposal of filter cake waste. Statement about the lack of adverse impact from site drainage cannot be made in the absence of a detailed hydro-geological study including the potential for sediment and containment transport.

The DFO must be involved to assess the threat to nearby fish and fish habitat from potential acid rock drainage and heavy metal and sediment migration

5. Project Traffic

Another major issue that has not been properly addressed is traffic hazard. CPS has added a traffic memorandum in the response to reviewer comments. The traffic memorandum includes light duty traffic peaking at 35 per hour and sand haul truck traffic. Propane, diesel fuel, shale pit clay, and water trucks are not included. An accurate determination of the volume of this truck traffic requires completion of the hydro-geological study to determine truck supplied make up water requirements and the technical NI 43-101 to determine truck transported sand production volume. Only the percentage increase in total traffic is given in the tables in the traffic memorandum and not the increase in truck traffic. The 2017 the annual average daily vehicle traffic (AADT) of 790 vehicles per day from the southern portion of highway 304 from Pine Falls to Manigotagan is used in the traffic memorandum calculation rather than northern portion of 540 AADT which would result in a higher traffic volume increase (<http://umtig.eng.umanitoba.ca/mhtis/flowmaps/flowmap2017.pdf>).

The calculation of traffic increase does not determine the increase in road accident, death and injury attributable to the Project. What The Frack Manitoba submitted an analysis of death and injury due to project truck traffic based on oil truck accident data in North Dakota. This data shows that as the volume of truck traffic increases, the lane number decreases and condition of the road deteriorates, the incidence of injury and death increases. A proper accident analysis of all traffic in the various road segments is required that includes factors such as volume of trucks and other vehicles, road deterioration, condition of shoulders, intersection hazards, number of lanes, and weather conditions.

Also required is an estimate of cumulative impact on traffic accidents from increased logging and mining activities. Dismissal of the cumulative impact from logging trucks based of the uncertainty of the recent intent to develop logging in the area is not defensible.

The use of a table that gives only percentage increase in vehicular traffic masks the increased risk of injury and death and attempts to present represent the hazard as a benign increase in traffic volume. The use of the higher AADT in the southern portion of highway 304 is an attempt to further minimize the adverse effects of Project truck traffic.

The March 18, 2109 notice of alteration of CPS to ship sand by truck directly to market rather using rail at transload facility in Winnipeg will result in an increase in truck traffic miles and a subsequent increase in risk of public injury and death. This increase in risk of injury and death should be evaluated and considered by the Provincial Environmental Approvals Branch before acceptance of the alteration of Project plans.

The issue of the cost and risks of increased road maintenance and deterioration has not been properly addressed. Only vague statements are made such as,

“It was noted that the section of PR 304 east of Stead to PTH 11 was classified as a secondary arterial and subject to spring weight restrictions. However, condition assessments for highway infrastructure are undertaken by Manitoba Infrastructure and they would have the latest information regarding the level of service of the road network. Notwithstanding, CPS is in ongoing discussions with Manitoba Infrastructure to determine possibilities for upgrading provincial infrastructure to accommodate the proposed Project traffic and maintain public safety.”

CPS has not carried out a thorough investigation of alternative transport options. The response to What The Frack Manitoba comments about the advantages and feasibility of transport by barge to the existing Lakeline Railway from Selkirk to Gimli was ignored. Barging of sand from Black Island to a rail line in Selkirk was successfully operated for 75 years from 1928 to 2003. Barge to rail is a proven, cheaper, safer and less carbon intense method of transport than trucking. The Lakeline Railway is currently operating. The barge to Lakeline Railway option is feasible and has been dismissed without reason. Only this vague statement was made by CPS.

“Various sand product transportation options, including barge and rail, were explored. However, truck transport was considered the most feasible option at this time.”

Manitoba Infrastructure, the Manitoba Department of Sustainable Development and the Canadian Environmental Assessment Agency should intervene to insure this option is thoroughly investigated. Lives are stake. Federal and provincial authorities would be abdicating their responsibility to protect the public if they do not mandate such an investigation. This is not a matter restricted to narrow corporate interest. The Public at large is at risk.

6. Silica Dust

Exposure to respirable silica dust is another major issue that has not been properly addressed by CPS. Here again the public is at risk and must be adequately protected. Worker health is also at risk.

The concerns about lack of coverage of all sources of silica dust by What The Frack Manitoba have not been properly addressed. There is no inclusion in the revised air dispersion modelling of the three 70 meter high sand stockpiles shown in the process flow diagram in the EAP. Only the overburden aggregate piles were added to the source for silica dust. Sources identified by a NIOSH study as being problematic especially to maintenance personnel such as thief hatches and fugitive dust from collection and conveyance systems as documented by What The Frack Manitoba were not adequately discussed. For instance no evidence has been given for efficacy of covering of conveyor belts under negative pressure. Without such evidence such assertions of dust control measure in the EAP are dubious at best and need to be evaluated and reviewed by appropriate experts in a thorough joint provincial and federal environmental assessment.

No detailed plan is given for worker silica dust monitoring and required respiratory protection as asked in What The Frack Manitoba documents. The CPS response simply states,

“As indicated in Section 6.9.1 ‘Worker Health and Safety’ in the EAP, worker protection in Manitoba is regulated through standards, procedures and training under the Workplace Safety and Health Regulation, M.R. 219/2015. Safety equipment and personal protective equipment will be supplied to employees and

workers. All contractors and visitors will be required to receive site specific environmental health and safety orientation for all phases of the Project.”

Safety equipment and personal protective equipment will be supplied to employees and workers”

The online Work Place Health and Safety Regulations have no provisions for silica dust exposure - only dust in general (<https://web2.gov.mb.ca/laws/regs/current/217.06.pdf>). CPS should give the specific sections of the regulations that they intend to follow. CPS does not give any detail about a silica dust exposure plan, employee training and medical monitoring.

Will air supplied respirators be used? If so where and when? How will on site silica dust levels be monitored? Will personal air monitor exposure equipment be used? Will there be a health a safety department with a health officer? Will compliance inspections be carried out? Will supervisors be trained in dust protection?

A dedicated employee and public safety program and structure, independent of management, and staffed by permanent qualified safety personnel must be developed together with proper protective equipment and comprehensive worker and public air and medical monitoring and workplace inspections as specified in the Manitoba Workplace Health and Safety Act which states,

“An employer shall establish a written workplace safety and health program for each workplace where 20 or more workers of that employer are regularly employed.”
(<https://web2.gov.mb.ca/laws/statutes/ccsm/w210e.php>).

According to the Act, a written workplace health and safety program must be established by CPS. The written program should be available as part of the assessment. Enforcement and administration of the Act falls to the Manitoba Workplace Health and Safety Branch under the Ministry of Growth Enterprise and Trade (<https://www.manitoba.ca/labour/safety/>). CPS should interact with the Work Place Health and Safety Branch for development and improvement of its health and safety. Provincial Health and Safety Officers are available to visit the workplace, inspect and assist with improvements to the written plan. The written workplace health and safety program must be established before the commencement of work.

In response to questions about air monitoring and responses to exceedances CPS replies,

“If the Air Quality Monitoring Plan detects air quality exceedances that require mitigation, an adaptive management approach to address exceedances will be developed in conjunction with MBSD.” (Manitoba Sustainable Development)

This statement simply deflects the issue and gives no indication of details of proper management for silica dust exposure. For instance community exposure to exceedances for silica dust might require a stay-in that would require cooperation with Manitoba Emergency Measures, education of local populations, comprehensive notification procedures and compensation. Vague plans to address exceedances in conjunction with MBSD plans could be deferred indefinitely.

CPS has misrepresented the air monitoring as a vague undefined process developed through ongoing consultations with MBSD rather than with the Workplace Health and Safety Branch and with Manitoba Emergency Measures. They have not demonstrated appreciation of the seriousness of the risk to the public and any emergency preparedness planning for silica dust exceedances. CPS has not demonstrated any expertise and experience in workplace health and safety and has not demonstrated plans to formulate a proper

written health and safety program. CPS should present such a written workplace health and safety plan and a plan for public protection from silica dust exceedances as part of the assessment process. A joint provincial and federal assessment should be convened with experts consulted to review the plans and mandate conditions and measures to implement and monitor the plans particularly with respect to prevention of silica dust exposure. Such plans cannot be made without detailed engineering specifications for the plant that would be provided in the completed NI 43-101 technical report and other design documents which CPS does not plan to provide as part of the assessment process. The importance of a comprehensive plan for silica dust exposure cannot be overemphasized. Real harm and death to both workers and the public will occur upon repeated exposure to silica dust.

7. Wildlife and Traditional Lands and Treaty Rights

The proponent states in appendix D, screening for cumulative effects,

“Aboriginal and Treaty Rights protected under Section 35 of the Constitution Act, 1982, are essentially communal rights. The proponent respects that the duly elected Council of Hollow Water First Nation is the body that speaks for the communally held rights of its people.”

That the Chief and Council speaks for the communal rights of the people is dubious. Many local residents feel that their concerns about the Project are not being adequately addressed by the band led consultation process. The Chief and Council of Hollow Water First Nation have signed a memorandum of understanding and received \$250,000 from the proponent as part of an economic partnership agreement before the commencement of Section 35 community consultation (<https://winnipeg.ctvnews.ca/proposed-silica-sand-mine-dividing-community-over-economic-environment-concerns-1.4322403>). As such the Chief and Council have expressed a clear bias for the Project and should not lead the community consultation. This is similar to the incidence of bias that precipitated the resignation of Energy East panel members for meeting with TransCanada in Quebec prior to commencement of hearings. (<https://www.cbc.ca/news/canada/montreal/neb-panel-steps-down-1.3755872>)

The proponent states,

“Project Site is not within a Traditional Territory of any other Regional Project Area First Nation including the Little Black River, Sagkeeng and Bloodvein First Nations. Therefore, no adverse cumulative effects on Indigenous and Treaty Rights are anticipated.”

Little Black River, Sagkeeng and Bloodvein First Nations all exercise fishing rights on Lake Winnipeg that could be affected by the Project. Fish are mobile and not restricted to the local waters around Wanipigow. Pyritic strata and overburden that will be disturbed by the Project and potentially subject to acid leaching and sediment migration may adversely affect the fishery. The extent of this risk has not been adequately assessed.

Little Black River and Sagkeeng First Nations hunt in traditional lands bordering highway 304. The increase in Project traffic may adversely affect hunting through increased road kill and stress. Such adverse effects have not been properly addressed by the proponent.

Statements by the proponent to the TAC and other reviewers that adverse local effects to traditional activities in the Project area such as community trapping are reversible have not been adequately demonstrated and supported by evidence.

Some reviewers expressed concerns that the depressions caused by the large removal of sand would result in permanent swaps in the Project area after rehabilitation that could cause irreversible adverse environmental effects and irreversible adverse effects on traditional activities. The proponent assertion that this would not occur are not supported by a comprehensive hydro-geological study that should be completed prior to environmental assessment.

8. Proponent Commitment to Health, Safety and Environmental Protection with respect to Associated Financial Pressures

Proponent management statements have indicated long term financing required to proceed with this Project may not be available particularly if burdened with costly environmental and safety and health procedures. CPS Management's Discussion and Analysis Document filed on the [sedar.com](http://www.sedar.com) site February 28 states,

“Risks Related to Environmental, Mining and Other Regulations

CPS and its prospective customers are subject to extensive environmental, health and safety regulations that impose, and will continue to impose, significant costs and liabilities. In addition, future regulations, or more stringent enforcement of existing regulations, could increase those costs and liabilities, which could adversely affect the Company's results of operations. Silica-related legislation, health issues and litigation could have a material adverse effect on the Company's business, reputation or results of operations.

Liquidity Risks

As at December 31, 2018, the Company had working capital of \$8,252,729 (September 30, 2018 – \$10,458,706). In order to meet its longer-term working capital needs and property development expenditures, the Company intends on securing additional financing to ensure that those obligations are properly discharged. As such, management believes that the Company will then have sufficient working capital to discharge its current and anticipated obligations for a minimum of one year. There can be no assurance that CPS will be successful in its efforts to arrange additional financing on terms satisfactory to the Company. If additional financing is raised through the issuance of shares from the treasury of the Company, control of CPS may change and shareholders may experience additional dilution. If adequate financing is not available or cannot be obtained on a timely basis, the Company may be required to delay, reduce the scope of, or eliminate one or more of its exploration activities or relinquish some or all of its rights to certain of its interests in mineral properties”

These statements make it clear expenditures on health and safety and environmental compliance contributes to Project financial risk. This financial risk creates an incentive to avoid costs of health, safety and environmental protection. For example the notice of alteration to transport sand by truck directly to market rather than through a trainload facility is likely necessitated by lack of capital required for road and other improvements required for the transload facility. Increased accident and death on the roads will occur as a result of the increased mileage of sand haul truck traffic. The likely major impediment to a much safe transport method of barge to the Lakeline Railway is the upfront cost required to obtain barges and to build a barge to rail loading facility. If CPS does not have the resources to complete a truck to rail transload facility in Winnipeg, they would not have the resources for barge to rail.

The rudimentary plan to dispose of pyritic shale on site in clay lined pits described by CPS in its response to reviewer comments would entail much lower cost than transport to and disposal at a site having less risk for environmental harm. CPS's ignoring of the pyritic oolite and pyrite impurity in the sand deposit that was reported in the 2014 NI 43-101 could well be motivated by cost avoidance.

CPS, however well intentioned, may not have the financial resources to complete adequate health and safety and environmental protection programs. CPS should not be left to manage health and safety and environmental management without a proper joint provincial and federal impact assessment and ongoing compliance monitoring mandated by the impact assessment.

9. Green House Gas (GHG) Emissions

In response to a CEA Agency request CPS has revised the GHG calculations to include emissions from the construction and decommissioning phase. The revised GHG calculations including construction and decommissioning in Table 13 of attachment A, give the total annual CO_{2e} emissions over the project lifetime to be 722,663 tonnes over a projected project lifetime of 53 years. The average annual emission rate over the project lifetime of 53 years is 13,635 tonnes per year. The annual emissions rate exclusive of decommissioning and construction given in Table 13 is 13,359 tonnes of CO_{2e} per year. This includes the operation of 24 haul trucks each operating at 100% of each hour. This is about half of the 26,526 tonnes of CO_{2e} per year given in Table 6-4 of the EAP. Table 6-4 and appendix E of the EAP gives the emissions from 54 sand haul trucks each operating at 100% of each hour to be 25,223 tonnes of CO_{2e} per year. It appears that the reduction in yearly emissions in Table 13 in the Proponent response to reviewer comments compared to the emissions given in the EAP is attributable to a large reduction in the calculated emissions from the haul trucks. The details of the calculations of emissions from the haul trucks are not given. The reason for reduction of the number of haul trucks from 54 to 24 is not explained.

In the traffic memorandum the number of loaded trucks per hour arriving at transload facility in Winnipeg is 3 to 4. Using 4 trucks per hour, 24 hours per day, and 365 days per year, to carry one million tonnes of sand each load must be 28.5 tonnes. The European Chemical Transport Association (ECTA) emission factor for trucks carrying 28 tonnes with 50% running empty is 63.9 gCO₂ per tonne-kilometre (https://www.ecta.com/resources/Documents/Best%20Practices%20Guidelines/guideline_for_measuring_and_managing_co2.pdf). According to the traffic memorandum a two way trip is 364.5 km. Using these data the CO₂ emissions to transport one million tonnes of sand per year is 23.3 kt of CO₂. This is consistent with the 25.223 kt of GHG emissions per year given for the haul trucks in Table 6-4 of the EAP. It would appear that the revised calculations of GHG emissions in the CPS response to reviewer comments have seriously underestimated emissions from haul trucks.

It should be noted that 28 tonne loads is at the upper limit of the chart for truck transport loads in the ECTA document. It must be questioned if highway 304 can bear this large load particularly in spring when load restrictions apply. It may well be that all the determinations of truck traffic volumes and GHG footprint are underestimated due to over estimation of the allowable load for each sand haul truck.

The revised GHG information does not address the concerns from the What The Frack Manitoba documents about the inadequacy of the calculation of emissions from the propane dryer and the lack of inclusion of emissions from propane, fuel, water trucks and employee traffic. Calculations in What The Frack Manitoba documents give the emissions for the propane rotary dryer as 11,200 tonnes CO_{2e} per year whereas the emissions from the dryer in Table 6-4 of the EAP are given to be 436 tonnes of CO_{2e} per year. The revised calculations in Table 10 of attachment A of response to comments give revised emission factors for the dryer for PM_{2.5}, PM₁₀, NO_x, SO₂ and CO but surprisingly not CO_{2e}. The reason for this is buried on the last page of attachment A of the response to TAC comments in the example calculations where it is stated that the rotary dryer is operated by electrical power that would result in no CO_{2e} emissions. This is a major design change and contradicts information in Table 6-4 of the EAP and information from the 2014 NI 43-101 technical report. Such a major change to emissions is not credible without an updated NI 43-101 technical report

especially considering the obscure manner in which the change was buried and not brought forward in the Proponent response to reviewer comments. The implications for the transmission line required to service the Project has not been updated with respect to this major change. This could have major implications for the electrical power requirements and required new power line for the Project.

The Proponent is responsible for the cost of a detailed design study by Hydro for the power line requiring 6 to 9 months after environmental approval and licensing. The Proponent is responsible for the cost of the electric service extension and all electrical equipment beyond the Manitoba Hydro point of delivery (https://www.hydro.mb.ca/your_business/setup_your_business_in_manitoba/). To complete the design study detail must be known about the Project power needs such as the voltage and current requirements of pumps the rotary dryer which will not be available until completion of the updated NI 43-101 technical report and related engineering specifications. The time required for the Hydro design study and the cost and time for completion of the 6 km 115 kV power line (appendix F of EAP) does not appear to be factored into the Project plans. The proposed initial November 2019 production from the wet plant sated in the EAP of the Project does appear to be compatible with the time required for the completion of environmental assessment, Project licensing, provision of detailed electrical engineering Project specifications, power line design and power line installation.

The 2017 and 2018 GHG reporting requirements issued by Environment and Climate Change Canada under its GHG Reporting Program apply to any facility with annual GHG emissions exceeding 10 kilo-tonnes (kt) CO_{2e} per year. (<https://www.canada.ca/en/environment-climate-change/services/climate-change/greenhouse-gas-emissions/facility-reporting/reporting/questions-answers.html>). Project emissions, remain uncertain due to missing and inconsistent information, but are greater than 10 kt CO_{2e} per year. This level of emissions is not inconsequential and must be accurately determined for all sources and accurately reported. The determination cannot be done until information on sand production rate, propane trucks, fuel trucks, sand trucks, hauling for pyrite disposal, and employee traffic is provided from the up to date NI 43-101 technical report. Information on make up water trucks requirements based on the hydro-geological report and the updated NI 43-101 technical report is also required.

A common excuse by any GHG emitter is that their emissions are a small fraction of national or global emissions and therefore do not require reduction. The proponent also uses this argument. According to this logic no GHG reduction would ever be implemented. This logic should not be accepted by the Agency or any responsible government.

The GHG emissions are based on the assumption of one million tonnes of sand production per year which is not credible without the updated NI 43-101 technical report and inconsistent with the 372 million tonne total resource reported to potential shareholders. The inconsistency in the revised and original GHG calculations and the neglect of What The Frack Manitoba concerns such as emissions from water, propane, diesel supply trucks, pyrite disposal and employee traffic further undermines the credibility of GHG calculations.

A very large mitigation of emissions could be obtained by the barge to rail option discussed above. There seems to be no credible reason why this option should not be implemented.

Climate change caused by increase in GHG is an existential threat to the environment and all life on earth including wildlife and aquatic species, peoples and habitat specifically covered under the Act. The primary market for the sand from the Project is hydraulic fracturing of oil and gas wells. The burning of the hydrocarbons from such wells is primarily responsible for the global increase in GHG causing detrimental climate change. The Project plan is to continue this detrimental activity for 53 years. There is no consideration for a decrease in supply consistent with the climate change mitigation measures of the Paris

agreement that are generally accepted globally as necessary. The detriment attributed to the global environment due to the frac sand from the Project is difficult to evaluate but is certainly not insignificant. To base the economic viability of the Project on 53 years of sustained or even increasing production seems irresponsible and risky. This is of particular concern given the problems reported in securing long term working capital needs. Investors are aware of the long term risks associated with fossil fuel industry in regard to climate change initiatives. CPS has attempted to portray the Project as a stable provider of long term employment. Given the uncertainty in securing adequate long term financing this is far from case. The entire viability of the Project is questionable. Adequate financial resources may not be available to implement comprehensive health, safety and environmental protection programs.

The GHG calculations for the Project are rife with inconsistencies. The large reduction in yearly emissions in the response to reviewer comments compared to the EAP, apparently due to a large decrease in calculated emissions from sand haul trucks, is not explained. The lack of contribution to emissions from fuel, water and clay or pyrite haul trucks, and plant traffic has still not been addressed. The GHG footprint and implications of the Project should be subject to a comprehensive joint federal and provincial impact assessment as it is clear that the GHG calculations from the Proponent are deeply flawed and cannot be trusted.

10. Conclusion and Recommendations

The Proponent has demonstrated a consistent attempt to avoid proper environmental impact study conducted jointly by federal and provincial authorities by understating the environmental and public safety risks. Examples of the minimization of harm and adverse effects are listed below.

- The Proponent did not consider the potentially serious consequences of iron pyrite and heavy metals in onsite shale in the EAP. In response to reviewer comments the Proponent attempts to dismiss the issue with a plan to dispose of the shale in local clay lined pits that have been shown to be susceptible to deterioration. This disposal method is unsupported by evidence and requires expert evaluation including by the DFO.
- The Proponent has not acknowledged sources of iron pyrite in oolite and the sand deposit that have been documented in the 2014 NI 43-101 technical report and has no plans to prevent acid drainage from these sources.
- The Proponent has no plans to test all the overburden for metal and pyrite content for the environmental assessment.
- The Proponent has not evaluated the potential for acid, sediment and heavy metal leaching and migration into nearby water bodies through a comprehensive hydro-geological study nor evaluated the potential effect on fish and fish habitat.
- The proponent has dismissed the risk to fish with the absurd assertion that there are no fish bearing water bodies on the plant property whereas the property is a raised peninsula that drains into the fish bearing waters of Lake Winnipeg, mouth of the Manigotagan River and to the Wanipigow River.
- The Proponent has not considered major sources of dust in their air dispersion modelling including from three 70 meter high sand stockpiles shown in a process flow diagram in the EAP and from thief hatches and other potential sources of leakage in the dust collection system.
- The Proponent has not prepared a required written workplace health and safety plan to deal with silica dust exposure and other workplace hazards.
- The Proponent has not developed a plan for public protection from exposure to silica dust exceedances which their air dispersion modelling has shown can occur. Such a plan would likely require emergency measures such as residential stay-in that would require coordination with

Manitoba Emergency Measures. Instead the Proponent has deferred a plan for public protection with vague assertions about consultation with the Department of Sustainable Development.

- The Proponent has not done proper Project traffic injury and death accident analysis such as done in a preliminary manner in What The Frack Manitoba documentation. The table in the traffic memorandum calculating increased volume, rather than a complete analysis of increase in injury and death, is an attempt to disguise the potential for harm.
- The Proponent does not consider the sand transport option of barge to Lakeline Railway that would diminish the GHG footprint and greatly reduce death and injury to the public. Lack of adequate working capital may prevent implementation of this option which would in the long term substantially reduce Project costs as well as greatly reduce risk of harm to the public.
- The Proponent does not include an analysis of increased injury and death associated with using trucks to ship directly to market. It appears that the Proponent is prepared to increase the traffic risk rather than devote resources operate of the truck to rail transload facility in Winnipeg at the commencement of shipping.
- The Proponent has documented in management plans a financial incentive to curtail health and safety and environmental protection measures.
- The Proponent does not properly address cumulative effects to traditional activities such as impact on the fisheries and hunting for Little Black River, Sagkeeng and Bloodvein.
- The Proponent does not consider cumulative effects such as increased incidence of injury and death from logging trucks from the proposed first nation logging activities or anticipated future mining operations in the area.
- The Proponent does not assess potential cumulative impacts associated with new exploration activities now underway in the area by the new owners of the Bissett mine
- The Proponent biased the Section 35 consultations through the memorandum of understanding supporting the Project signed by the Hollow Water Band and by giving \$250,000 to the band prior to the consultations that are band orchestrated.
- The Proponent has presented inconsistent information on Project greenhouse gas emissions that cannot be supported without a completed NI 43-101 technical report and hydro-geological report
- The Proponent has neglected the effect of climate change mitigation on the long term financial viability of the Project.
- The Proponent appears to have switched from propane fired rotary sand dryer to electric without provision of detailed electrical engineering specifications of the Project power requirements necessary for the determination of cost and time for design and construction of a new power line to the Project.
- The Proponent has based their EAP on incomplete information in absence of a completed NI 43-101 technical report and hydro-geological study that makes such determinations as whether the Project should fall under the Federal Environmental Assessment Act, amount of GHG emissions, determination of water usage, and impacts on local aquatic environment impossible.

Given these concerns, we request that, as per the 2018 Information Bulletin – Environmental Assessment and Licensing under The Environment Act, that a set of guidelines be issued to the Company to prepare a full Environmental Impact Statement for its proposed frac sand mine and processing facility and access road which addresses the numerous information gaps that are outlined in this document.

What The Frack Manitoba has garnered over 3200 signatures on a petition, which clearly demonstrates a high level of public concerns with respect to this propose development project (<https://www.change.org/p/a-request-for-a-joint-federal-provincial-environmental-panel-review-process-of-a-proposed-frack-sand-mining-operation-in-manitoba>). What the Frac Manitoba has provided evidence to the federal government that there will be sufficient significant adverse impacts under federal jurisdiction to warrant a review of the proposed

development project under the Canadian Environmental Assessment Act. The petition calls on both the Provincial and Federal governments to undertake a joint Federal/Provincial public panel environmental review of the proposed development project.

What The Frack Manitoba calls on the Director of the Environmental Approval Branch to exercise his/her authority under Section 11(9)(e) of the Manitoba Environment Act and request the Minister to direct the chairperson of the clean environment commission to hold a public hearing on this proposed development project.

Winsor, Jennifer (SD)

From: Robert Fenton [REDACTED]
Sent: March-16-19 10:42 AM
To: Winsor, Jennifer (SD)
Subject: Re: Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project - Environment Act Proposal Public Review - File No. 5991.00

Follow Up Flag: Follow up
Flag Status: Flagged

I am pleased to comment further on this proposal.

With respect to the repose to my **groundwater concerns**, I note that CPS continues to offer assurances when the groundwater studies are still underway. This is hardly reassuring. I also note that they plan to capture and use surface water that maybe essential to the groundwater recharge at our well. We are at the bottom of a 30 metre hill, so what happens uphill surely will impact the water percolating through granite to my well. Until the studies are completed, the groundwater model developed tested and critiqued, I see no way of being reassured by the CPS's comments.

I note the 30 metre hill comment in the previous paragraph. This gives a visualization of what CPS proposes. If they were to dig a 30 metre deep cell on the Pelican Inlet property, the whole hill from the lake to the Seymourville road would disappear and all of the property would be at lake level. If they dug on either side of Pelican Inlet, the development would sit on a ridge between two valleys.

In response to my issue on **compliance** and adding other interest groups to the Operational Oversight Committee, CPS seems to have re-iterated the statement from the EAP. This is not helpful.

A major plank of the argument against concerns about **air quality and sound** seems to be the commitment not to do operations within a 100 metre buffer of a permanent residence. They then say this does not apply to cottage developments because of the zoning (AirQ14). This theme is carried on in the Air Modelling Report. The map shows the location of the nearest residence to the processing plant. Although my house appears to be further away from the plant (what distance?) it is certainly much closer to potential extraction locations. The air quality modelling should include receptor points in the cottage development areas as well.

My cottage is very permanent. Many years I spend as much time in my Pelican house as I do in my residentially zoned condo in Winnipeg. Certainly the amounts invested in the two building are comparable. Many farm dwellings, trappers homes and fisher's residences are not located in areas zoned residential. Those folks would consider their residences permanent.

The response on **recreation and tourism** (Q2) and the EAP are incorrect. The area to be quarried is used extensively for recreational activities.

The issue of **traffic** brought 42 comments including my own. Generally we were referred to the traffic memorandum. The **Traffic Memorandum**, as statements to the financial regulators say, is full of forward looking statements putting the onus on future discussions and the responsibilities on the Manitoba government. The memorandum does show significant impact of the project on traffic flows (28% on AADT and 16% for peak hour) between #11 and Manigotagan. The commentary on the number of sand trucks on the road each hour implies potentially interacting with 8 -12 sand trucks for each trip between Stead and Manigotagan. This figure is larger than I experienced during the Tembec operating days. The impact of that number of trucks will include road maintenance issues but also the relative speed at which they are travelling. Of course, I will meet all of the trucks in the opposing direction. If the same direction trucks are going faster I will be passed. If they are going slower I will be tempted to pass them. All of these options provide for increased hazard. (A commentary in the press noted that the mill in Pine Falls received 90 trucks a day which would be a comparable aggregate number. Unfortunately the sand trucks are all operating on #304 whereas the logging trucks traveled on several roads.)

I would like to see more progress on the road improvement discussions before a license is granted. The Manitoba government will receive significant revenue from this operation and agreements for financial contribution to #304 upgrades should be a condition of approval.

Thank you

From: Winsor, Jennifer (SD)

Sent: March 14, 2019 10:43 AM

To: Winsor, Jennifer (SD)

Subject: Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project - Environment Act Proposal Public Review - File No. 5991.00

Good morning,

Thank you for participating in the environmental assessment public review process for the Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project Environment Act Proposal (EAP). The information you provided, along with other public and Technical Advisory Committee (TAC) comments, was sent to the proponent for their response.

The response from the proponent is now on the Public Registry and can be reviewed here:

<https://www.gov.mb.ca/sd/eal/registries/5991wanipigow/index.html>.

If you have further questions and/or comments regarding the proponent's additional information provided, please send your comments in writing (email or letter) to my attention on or before **April 8th, 2019**.

Best regards,

Jennifer Winsor, P.Eng.

Environmental Engineer

Environmental Approvals Branch

Department of Sustainable Development

1007 Century Street

Winsor, Jennifer (SD)

From: Marvin Koop [REDACTED]
Sent: March-14-19 11:28 AM
To: Winsor, Jennifer (SD)
Subject: Re: Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project - Environment Act Proposal Public Review - File No. 5991.00

thanks Jennifer, I certainly appreciate all your hard work in oversight / management of this EAP process and in your feedback and acknowledgement of the inputs received.

I took a drive through the project location along the internal access roads yesterday with my grandson.

One additional concern, which may have been already noted in some of the submissions but that I overlooked on mine, was the negative impact on the bird population, with so many of the large and smaller trees being bulldozed, and the damage that the dozers are also inflicting on the trees left standing, which will also likely die quickly. We really enjoy watching the larger species in our neighborhood, especially the bald eagles, owls, pilated and red headed woodpeckers - some of the local eagles are already back this week, and will probably be a bit surprised by the additional onslaught of winter weather today, although we only have strong winds here, no snow. Hard to imagine that any of those species will remain and nest in this wider area, once there is so much industrial noise and destruction of their habitat.

regards

Marv

On Thu, Mar 14, 2019 at 10:44 AM Winsor, Jennifer (SD) <Jennifer.Winsor@gov.mb.ca> wrote:

Good morning,

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