

CanWhite Sands – Sand Processing Facility Environment Act Proposal – File No. 6057.00

Public Comments Received From:

LINDA DAWSON	Gerry Smerchanski
Michael Lavich	Ally Johnston
Tamara Toews-López	Chelsey & Anthony Domienik
Lindy Clubb	Charlene Currie
Sue Ziemski	Mark Waldner
Michael Bagamery	Brian J. Pannell
Herman and Marilyn Bouw	
Jocelyne Wilson	
Diane Kunec	
Tory Warkentin	
Fred Bowley	
Samantha Braun	
Dianna Larkin-Seepish	
Mary Ann Haddad	
Ken Siwak	
Sarah Ans Tomiak	
Darlene Ans	
Glen Koroluk	
Matthew Tomiak	
Don Ans	
Janice Gray	
Peggy Kasuba	
Nancy Kasuba	
Jennifer Porter	
C. Hugh Arklie	
Darryl Speer	
Matthew Wiens	

I am writing to express my profound opposition to The Vivian Sand Facility and Extraction project plan to mine cancer-causing silica sand from the groundwater aquifer in the Oakbank-Dugald-Anola area — one of Manitoba's largest aquifers.

The stage licensing approach being taken here is clearly an underhanded approach to moving a fracking project forward secretively, avoiding public scrutiny.

Mining the sand from deep underground in the aquifer where it has been safely filtering our groundwater for thousands of years is a terrible idea. Water is sacred and must be protected. We should absolutely not be mining any of our groundwater aquifers! Water is crucial to life. Under no circumstance can we mine sand in Manitoba for fracking. All elected officials should take a stand against the expansion of this destructive process.

I do not support mining sand from the aquifer under any circumstances but to use the sand for fracking is extremely concerning.

Unless this sand plant can prove it is not using the sand for fracking, it must absolutely not be given a licence. Under no circumstance can we mine sand in Manitoba for fracking. All elected officials should take a stand against the expansion of this destructive process.

Thank you.

Yours truly,

LINDA DAWSON

Please see my comments originally directed to my MLA Bob Lagasse below.

Thank you.

Regards,

Michael Lavich

Lorette MB

From: CA Lagasse

To: Lavich, Michael

Subject: Re: Can Sand Project

Thank you for bringing your concerns forward to the office of Bob Lagassé, MLA for Dawson Trail. Please be assured that MLA Lagassé appreciates hearing from the constituents of Dawson Trail and is very much aware of your concerns.

It is CanWhite's intention to transition to a commercial mining project in the near future. In order to facilitate this development they will file an application under the Environment Act to obtain an Environment Act License. Before the project can commence production, they will be required to have an approved Mine Closure plan legislated under the Mines Act.

The Environmental Act License Application process is a rigorous process involving several departments of government and public consultation. There will be opportunity to have your

concerns addressed in a transparent and comprehensive process. The application may be viewed at <https://www.gov.mb.ca/sd/eal/registries/index.html> after an application has been made.

If you have additional concerns please do not hesitate to reach out to our office and we can forward your concerns on to the department.

Regards,

Lisa Dyck/Constituency Assistant for Bob Lagasse, MLA for Dawson Trail

From: Lavich, Michael

To: CA Lagasse

Subject: Can Sand Project

Dear Bob,

I am concerned about the announcement of a new Silica Sand test project that could result in the future development of a silica sand mine.

As it stands today, without a lot of information given to the public, especially regarding the water table and quality of the drinking water I stand against this project.

Regards

Michale Lavich

Lorette MB

I strongly ask that you determine the Vivian Sand Facility (processing plant) be combined with the mining/extraction portion of the operation and be considered as a Class 3 development with a Clean Environment Commission public hearing with participant funding.

My reasons are as follows:

The size and scope of this project: The mining claims of 166,890 acres (67,537 hectares) of land is the largest given to any one company in Manitoba's history. The impacts of the processing plant cannot be properly assessed without including an assessment of the impacts of sand extraction, because the processing plant cannot operate without the sand extraction portion of this project.

Impacts to the Sandstone and Carbonate Aquifers: This silica mining will take place over 200 feet into the Winnipeg Formation of the Sandstone aquifer. The shale that separates the two aquifers and the sand contains sulphide which when exposed to air will turn to acid and cause leaching of acid and heavy metals into the water from the shale.

Aquifer Sustainability and Cumulative Impacts: The aquifers support many municipal water systems, agriculture, industry, private well users and of course an abundance of wildlife and ecosystems. The sustainable yield of these aquifers have not been established. Also, the processing plant and the sand extraction aspects of this project function in tandem.

Potential Transboundary Impacts: The aquifers extend into Minnesota and therefore transboundary impacts need to be addressed.

Unproven Mining Method: CanWhite Sands Corp. is experimenting with a new, unprecedented method for mining silica sand 200 feet below the surface out of the Winnipeg Formation, a process that has only been experimented within Manitoba, without much success in the past. Clean water is precious!

Sincerely,

Tamara Toews-López

I am a frequent visitor to the Oakbank, Dugald, Anola area for traditional ceremonies, medicine picking and social purposes. Therefore, I am greatly concerned about the above proposal and its effect on land, water, earth, roads and the community.

I find it incomprehensible that Brokenhead First Nation was not consulted, meaningfully, by either the company or the government. This must change. We are obliged to consult with and show respect for First Nations in Manitoba and elsewhere.

I participated in Clean Environment Commission Hearings as a presenter, years ago, to oppose withdrawals from the Sandilands Aquifer for commercial and domestic use. I am opposed to threats to this aquifer from industrial use and possible contamination of an aquifer when we still don't fully understand the relationship between surface and underground water. Can you tell me if all source points for this aquifer have been located and protected? If not, and certainly in the case of the droughts we've experienced these past few years on our acreage and others, then the supply for existing wells comes before additional and non essential Industries.

We should not be supporting the fracking industry in any way in our province or elsewhere. Perhaps Vivian Facilities could pay for all the clean up of contamination and cap old wells and mine site bore holes before it is permitted to create more.

The staged licensing approach is a loophole used over and over again to gain a foothold for polluting, harmful projects. It is the responsibility of your department to close that door. One has to wonder why we have environmental protections if the project and the cumulative effects are not considered as a whole. It's like going to the doctor with a urinary tract infection and he/she examines the upper body only. Companies must be laughing about our regulatory frameworks. Please deny a license for the Vivien Sand Facility.

Sincerely,

Original signed by

Lindy Clubb

I am a resident of the RM of Springfield in Cooks Creek. I am extremely concerned that CanWhite has been allowed to test for Silica sand in our municipality.

We know that their intention is to extract silica sand to be used mostly for fracking operations. We also know that they have to penetrate our drinking water aquifer.

The idea that we would allow the quite probable contamination of our drinking water in order to provide silica sand for the purpose of fossil fuel extraction to an industry that will likely not be around in 35 years is quite irresponsible.

Please do not grant this company the rights to mine silica sand in Manitoba. Our water is too precious to us and our future generations.

thank you

Sue Ziemski

I am concerned about the silica mine expansion for “frack sand” in the Rural Municipality of Springfield. I think the potential health and environmental risks will likely outweigh the potential employment and economic benefits. Springfield residents including Hugh Arklie, Tanzi Bell, Janine Gibson, Dennis Le Neveu, and Anne Wowchuk have given similar reasons for opposing it. These residents are worried about silicosis, a debilitating and fatal lung disease incurred by inhaling silica dust, and the potential to deplete the Sandilands Aquifer as well as contaminate said aquifer, the Brokenhead River, and Lake Winnipeg.

Compounding the long-term ill effects from health threats, the silica sand mine is an exercise in the extraction of a natural resource more quickly than it regenerates. It is *because* I support Springfield’s goal of achieving long-term prosperity that I think it should not approve the frack sand mine and should invest in regenerative activities instead.

Concerned Manitoban,
Michael Bagamery

We reside in the R.M. of Springfield and our water comes from the Sandilands/Carbonate Aquifers. We are very alarmed to hear of the scope of the project and the fact that the Vivian Sands project Environmental Assessment Plan for the Processing Plant is not adequate in detail or accuracy.

Please hear both the mining and processing of silica sand as one Environmental Assessment Proposal. This needs to be raised to a Class 3 Development including a public Clean Environment Commission Hearing. We ask that there be Intervenor funding to allow for an independent, in-depth analysis of this project.

This issue cuts to the core of our survival here: we are cattle farmers that rely on good, safe drinking water for our families and animals. This is not a resource to be tampered with for profit, with a short sighted view of short-term gain for (our) long-term pain! It cannot be given over to a profit-driven company, to squander this resource as has been done elsewhere, to their everlasting regret. And to pursue this for the benefit of the fossil-fuel industry, which we are committed to replacing or minimizing as soon as possible for the sake of our environment, makes absolutely no sense! The resource of clean drinking water is an inalienable right. Do not allow them to tamper with or destroy it.

We demand that the requests of the affected residents be heeded and that all due diligence in this matter be done.

Very Sincerely,

Herman and Marilyn Bouw

I ask that you determine the Vivian Sand Facility (processing plant) be combined with the mining/extraction portion of the operation and be considered as a Class 3 development with a Clean Environment Commission public hearing with participant funding.

My reasons are as follows:

The size and scope of this project: The mining claims of 166,890 acres (67,537 hectares) of land is the largest given to any one company in Manitoba's history. The impacts of the processing plant cannot be properly assessed without including an assessment of the impacts of sand extraction, because the processing plant cannot operate without the sand extraction portion of this project.

Impacts to the Sandstone and Carbonate Aquifers: This silica mining will take place over 200 feet into the Winnipeg Formation of the Sandstone aquifer. The shale that separates the two aquifers and the sand contains sulphide which when exposed to air will turn to acid and cause leaching of acid and heavy metals into the water from the shale.

Aquifer Sustainability and Cumulative Impacts: The aquifers support many municipal water systems, agriculture, industry, private well users and of course an abundance of wildlife and ecosystems. The sustainable yield of these aquifers have not been established. Also, the processing plant and the sand extraction aspects of this project function in tandem.

Potential Transboundary Impacts: The aquifers extend into Minnesota and therefore transboundary impacts need to be addressed.

Unproven Mining Method: CanWhite Sands Corp. is experimenting with a new, unprecedented method for mining silica sand 200 feet below the surface out of the Winnipeg Formation, a process that has only been experimented within Manitoba, without much success in the past.

Sincerely,

Jocelyne Wilson

I am writing to you as part of the public comment process for proposal # 6057 Vivian Sand Facility Project submitted to the Government of Manitoba for approval and licensing by CanWhite Sands.

I write to you as a ratepayer in the RM of Reynolds, whose enjoys the use of very good water from our well, as someone with a Master's in Natural Resources Management who, during my work as an environmental consultant, contributed to a number of environmental impact assessments for large projects in Manitoba (e.g. Repap pulp mill in The Pas, Mb Hydro

transmission lines in SW Mb, to name a few), as well as an Honourary Life Member of Nature Manitoba since 1997.

I share a number of the concerns that others in the area have raised about both the facility and extraction process that will be used to recover silica sand from deep wells over a very extensive area of Southeastern Manitoba.

I summarize my concerns as follows:

- Reviewing the proposal for the processing facility ahead of the proposal for the extraction process, to allow for construction to begin this fall, makes it very difficult to believe this government's environmental review of the project's full impacts will not be prejudiced in favour of the entire project, regardless of the potential for the full project to have serious negative environmental impacts on the aquifers which supply the majority of SE Manitoba with its potable water supply, as well as on water quality in the Brokenhead River and the entire watershed including Lake Winnipeg;
- The lack of meaningful consultation with indigenous communities in the area who will be potentially affected by the proposed facility and the extraction activities;
- The reduction in the information and consultation process which was to be carried out this past summer by CanWhite Sands due to the limitations imposed by Covid-19.
- The potential for silica sand to be released into the air from sand stored outside at the facility or while it is being transferred from the plant to rail cars for transport to market.

Given the geographic extent of the extraction activities, both the licensing of the processing facility and the extraction process and activities, along with any proposed monitoring and mitigation activities, should be the subject of a full and complete hearing by the Clean Environment Commission.

I look forward to hearing from you regarding the next steps our Government will take to ensure CanWhite Sands' proposed activities will not seriously impact the ground water and surface waters of Southeastern Manitoba, its residents or its terrestrial ecosystems and wildlife.

Sincerely,

Diane Kunec

We are writing to advise that the City of Steinbach is seeking further information and that it is also its intent to provide further comments to the above noted proposal. The City is presently reviewing the application and it appears that the project will affect the underground limestone aquifer that serves as the City's source of drinking water. Further comments will be provided as soon as possible.

Should you have any questions, please let me know at your earliest convenience.

Thank you.

Yours truly,

Tory Warkentin

Hello I live in Taché and have for a long time I am very concerned about the silica mining that will affect tache and surrounding communities water and road traffic. My neighbors are also very concerned. Why in this day and age would anyone allow any company to mess with water supply that people depend on for money!!! We live on Heatherdale road which has been identified as one area for the mining. All the people on this road are dead set against this potential environmental disaster!! Plus its close to a growing town of lorette. Ridiculous!
Thanks

Fred Bowley

I'm writing in regards to the environmental and future water resource quality issues that seem irrefutable from allowing the Vivian Sand Facility project to continue as stated in CanWhite Sands Corp's EAP.

My name is Samantha Braun and I'm a resident of the RM of Brokenhead. My property is right on the river where my kids and I play, swim and witness the ecological wonder that is part of this area... I'm also a landscape ecologist with an MSc from the U of M and years of teaching and taking kids out on the landscape working with the Nature Conservancy of Canada in the Vivian area of Manitoba and familiar with the geology of the Winnipeg formation CanWhite intends to extract sand from.

Admittedly, my innate bias as an ecologist, and reaction to reading the EPA from CanWhite is absolute concern for the potential (and probable given the company's history) contamination of surface water with heavy metals contaminating the sand layers with pyrite from overlaying shale. Essentially pyrite that is very realistically present in that shale deposit (as it is elsewhere in the formation, and either accidentally or purposefully omitted on the EPA), mixing into the extraction slurry and oxidizing forming very biologically relevant substances that will be brought to the surface where they can disrupt the species and balance of the existing soils and as overland flow to the Brokenhead River.

Toxic metals and acidified ground water brought to the surface will necessarily flow to the Brokenhead via a series of existing ditches and drainage channels. That river has a very definite fish community, and impacts to it would be of federal concern. There needs to be a Federal Impact Assessment of said risk before proceeding with the project. To negate that requirement and go forward without such a review would be completely unacceptable by the Province. Another concern is the treatment of the waste water on site in retention ponds and use of polyacrylamide flocculent to attempt to mitigate the risk of contaminated water leaving the site. Polyacrylamide breaks down in light to form tetarogenic and carcinogenic compounds which should never be allowed to reach an aquatic system (ie ditches and riparian areas like the Brokenhead which also route to Lake Winnipeg, an already over taxed system in terms of environmental impacts and degradation).

I'll be blunt, the set up as described seems to be missing a lot of water to do what's needed to get sand up and out, and very little explanation for what is going to be done with that water, and how to do whatever that is without dumping it overland to the Brokenhead. Again, that's a problem needing addressing properly in the EPA and isn't.

Which brings me to another very valid concern in general for the project. The water needed to extract sand for this project is massive. More than seems outlined in the CanWhite EAP. I have read the concerns of local residents on how removing water for this facility may irreparably damage the aquifer so many need for drinking water and farm operations. There is no doubt either that drawing water out faster than it can filter back in will cause a decline in water quality for those drawing off the resource. Specific concern is increasing arsenic in the groundwater which is already at a threshold in the area of the Vivian facility and surrounding extraction claims.

Slumping, and ensuing contamination of boreholes via overland bacteria and farm operations is a valid threat too. Destroying the clean drinking water of thousands for possibly 50 jobs in a facility that's essentially being built to be flipped by the proponents own admission seems completely irresponsible and ethically wrong for those left with the footprint of a fast decision now.

On a more long-term point, there also seems to be an omission of any sort of ecological exit plan, and financial outline of said plan, for when the extraction process has been exhausted or the company has finished using the site. There needs to be a long-term strategy in place before the project is approved in order to protect Manitobans from footing a bill for ecological remediation should CanWhite or subsequent owners of the operation pull out, or run out of economic benefit to keeping the facility running.

I've had a look at the specifics on water use by D.M. LeNeveu, in his report submitted to you for the same project, and while my specialty is admittedly more ecological in its nature, his calculations on water use are both technically relevant and relevant by common sense. His calculations estimate a max water use of 7.7 million cubic meters of water a year; almost double the recharge rate and almost certainly not accounted for on-site for recycling or preventing contaminated runoff.

That discrepancy alone warrants federal involvement, again, as it pertains to fish habitat and we can't undo damage to either aquifers or riparian systems in a biologically relevant time frame. Please consider the very real costs for what seems so little benefit for real Manitobans, both those in the direct area of Vivian and those along the entire pathway of the water systems involved.

Please also consider we are stewards of these resources for our generations long after us and the facility has run its usefulness both economically and functionally.

I appreciate your time and consideration in addressing our concerns with this proposed facility and its requirements to operate.

Samantha Braun,

Allowing a for profit unreliable corporation to contaminate the environment seems to be a thoughtless act. Silicon dust is a health hazard. Too small to filter.

Making the local vegetation ie. my daughters garden unusable. The water table unsure
Online investigation shows disgusting sites contamination and NO follow up by the local governments. A few jobs in the area at lot worth the long term ramifications.

Yours truly,

Dianna Larkin-Seepish

Thanks alot for the information skimmed through some of the pages.. Way too much to obsorb at once.

Something I did noticed in the letter of [June 18](#) from Man Conservation & climate there is reference to HD Minerals Ltd.

If something happens on the worksite or damage to adjacent properties, etc who holds or takes liability.

Is it the company that has signed this document of is it HD Minerals who is responsible on the worksite.

It seems ambiguos or not clear on who does assumes or will incur responsibility for costs & damages.

What past history do either of the companies have for following up on their commitments.

I am sure the legals in the picture will have the answers but there is alot at stake for our community.

MAJOR CONCERNS:

What happens if we start having trouble with our water supply, water quality,consumption levels are

questionable right now as it is with restrainsts

Concerned about water contamination of our communities water supply. Our community is growing healthy

water supply is critical to maintain for our community, business and schools.

Air Quality will be an issue and proximity to home, farmland and livestock.

We do not support this project being in a populated area.

Please forward any fujrther relevant information on tis project.

This should not be approved by Environment.

Thank you

Mary Ann Haddad

Ken Siwak

As a property owner and resident of the Municipality of Springfield, I wish to oppose any potential mining or development of the silica found within our municipality.

Specifically, I feel the environmental and water impacts are unacceptable. The aquifer contained within this area provides safe and accessible water to a significant number of residents and cannot be adequately replaced. Water is a finite and valuable resource and should be treated as such. I believe a failure to protect this resource would significantly drop quality of life and real estate values in our municipality.

Please do not put an experimental mine over the health and well being of our residents and environment.

Sincerely,

Sarah Ans Tomiak

As a homeowner in the Springfield municipality I am in opposition to the the Canwhite development of the silica mine. I am gravely concerned that it will put at risk our aquifer that supplies a large area and many many people. Once contaminated how would you ever restore it to it's original condition.

I am aware that there is a clause that requires the company to restore everything to original but there have been many a company that have gone out of business before this happens leaving the government to pick up the cost. Again I emphasize how could a contaminated aquifer ever be restored?

Water is a precious commodity in our world. It should be treasured and safe guarded for our children and their children.

The amount of economic gain that would result would not come close to the cost of aquifer restoration and the economic hardship experienced by the people affected should the aquifer be compromised.

Please think of the future generations not short term gain of twenty or so years.

Sincerely,

Darlene Ans

This letter is in response to the Environment Act Proposal (EAP) for the Vivian Sand Facility Project. Since 1988, the Manitoba Eco-Network (MbEN) has promoted positive environmental action by supporting people and groups in our community. Local residents have contacted us and expressed serious concerns about CanWhite's proposed development and its potential impacts on the environment and human health. There has also been significant concern about the scope of the proposed project and corresponding environmental assessment. CanWhite has publicly stated that they intend to undertake additional silica sand extraction activities but will pursue a separate licence for these undertakings. We find this process of splitting up CanWhite's silica sand activities for licensing purposes very problematic.

We ask that you require an expansion of the scope of the Vivian Sand Facility Project environmental assessment to include CanWhite's proposed silica sand extraction activities to ensure the cumulative effects of CanWhite Sands silica sand activities are meaningfully considered. To facilitate meaningful public participation, we also ask that you consider CanWhite's combined silica sand activities as a Class 3 Development and require a Clean Environment Commission public hearing with participant funding.

Our reasons are as follows:

The size and scope of this project CanWhite's mining claims of 166,890 acres (67,537 hectares) of land is the largest given to any one company in Manitoba's history. The impacts of the processing plant cannot be properly assessed without including an assessment of the impacts of

sand extraction, because the processing plant cannot operate without the sand extraction portion of this project.

The EAP states,

*Sand will enter the Processing Facility via a sand and water slurry infeed pipe (Figure 2-2). As described above in Section 1.1, the moveable slurry pipe supplying the infeed **will be a component of the extraction project that will be proposed for approval later this summer** p 12/129*

and,

*The sand is removed, water is treated (as explained in Section 2.3.1), and **the water is returned to the to the slurry line system at the extraction site**, creating a loop system (illustrated in Figure 2-1) for bringing slurry to the facility for processing. P 19/129*

It is unclear in CanWhite's EAP as to how much water will be flowing through and into the facility as a result of their slurry line technology, recycling systems and on-site waste water surface tank. Impacts to the Sandstone and Carbonate Aquifers The silica mining/extraction will take place 200 feet under the surface in the Winnipeg Formation of the Sandstone aquifer, which is overlain by a layer of shale, the carbonate aquifer and till. Once brought up to the surface and exposed to air, the shale that separates the two aquifers and the sand will potentially generate acid and cause leaching of acid and heavy metals into the water from the shale.

The science advisor of the local organization, What the Frack Manitoba (WTFM), indicates acid drainage has occurred and is still occurring at an abandoned silica mine on Black Island. In their assessment of the EAP, WTFM predicts that,

The three sources of pyrite at Vivian, the shale, the sand and the oolite will begin to leach acid and heavy metals into the aquifer upon exposure to the compressed air used to extract sand as described in the EAP.1

Aquifer Sustainability and Cumulative Impacts The aquifers threatened by CanWhite's silica sand activities support many municipal water systems, agriculture, industry, private well users and of course an abundance of wildlife and ecosystems. The sustainable yield of these aquifers, have not been established. It is also unclear how much water will be used for the combined processing plant and sand extraction aspects of this project.

One report for government by Betcher and Ferguson² concluded:

Approximately 1500 water wells have been drilled as open holes interconnecting the Winnipeg Formation aquifer and the overlying Carbonate aquifer in south-eastern Manitoba. The open hole well design has allowed the exchange of formation fluids between the two aquifers with a number of consequent impacts. These include an accelerated loss of head in the Winnipeg Formation aquifer to the extent that flowing artesian conditions are now found only in a few areas, possible movement of the fresh water-saline water boundary, a loss of the unique naturally softened groundwater, and local water quality changes in the Carbonate aquifer.

Kennedy and Woodbury³ in developing a model for the sustainability of the carbonate and sandstone aquifers, made the observation that:

With increased population and development it is most likely that the stresses on the groundwater system will continue to increase. To account for this increase in stress, the domestic pumping rates

were increased with time. The pumping rates were assumed to increase by 2% every five years (comparable to population increase). The model was then run over a 20-year period...

In terms of sustainability, there remains a region where the heads dropped below the top of the aquifer and where dewatering may occur. Note also the percent of recharge taken by well extraction has increased to 55% from the base sustainability case. This value is greater than the maximum suggested value of 50% of recharge, indicating that the system is no longer sustainable.

The Southeast Regional Groundwater Management Plan (SRGMP)⁴ identifies a number of unknowns in both aquifers (carbonate and sandstone) including rates of recharge, movement of the saline and brackish groundwater into freshwater zones and sustainable yield. It is unclear if Manitoba has implemented the SRGMP and there is no indication in the EAP, that the proponent is aware of the plan.

Unproven Mining Method CanWhite Sands Corp. is experimenting with a new, unprecedented method for mining silica sand 200 feet below the surface in the Winnipeg Formation, a process that has only been experimented with in Manitoba, without much success in the past.⁵ CanWhite confirmed this technological challenge in their EAP where they stated that they anticipate,

*...that special license conditions will have to be contemplated for extraction which will involve changing of extraction sites on a relatively frequent basis, **which is not typical for Environment Act Licenses**...is proposing an extraction project for licensing later this year, while construction of the Processing Facility is underway P7/129*

It would be irresponsible to build a facility without first assessing the use of an unknown technology that can potentially denigrate Manitoba's southeastern and Interlake groundwater and surface water sources.

MbEN appreciates your consideration of our comments about the environmental assessment and licensing of CanWhite's proposed silica sand extraction and processing activities and welcomes future opportunities to engage with the Department in the assessment of projects in Manitoba to ensure the highest level of environmental protection measures are required. Under *The Environment Act*, the Department is tasked with protecting the quality of the environment and environmental health of present and future generations and providing the opportunity for all citizens to exercise influence over the quality of their living environment. We are confident you will adhere to these principles and ensure an informed decision about the proposed development can be made.

Sincerely,

Glen Koroluk

I am writing in regards to the proposed Silica Mine within our municipality. As a full time resident and property owner, I strongly oppose the development and extraction of the discovered silica. Specifically, I feel extraction will severely impact our water supply, environment, developed road infrastructure and safety of the surrounding area.

The water contained within the aquifer is the only water supply for many households and can not be easily replaced. Finding and developing another source of water would be cost prohibitive and pointless considering we already have a source. Failing to care for and protect this resource

is an unacceptable reason to need to find alternates. I feel that mining and extraction will not only damage the water source, but consume a great amount of available water that would otherwise be safe for consumption and household use. This will cause real estate within the supplied area to lose value quickly and severely limit our growth as a community. In addition, the roads and highways of our municipality are not built to adequately withstand the repetitive and heavy traffic increase. Upgrading and maintaining the infrastructure to support the mining would be very expensive as a municipality and we would be unlikely to see enough compensation from the company to adequately balance the costs to our community. In summary, I ask that the proposed silica mine be opposed in any form as the environmental, community and economic impacts are too great to consider extraction.

Thank you,

Matthew Tomiak

I am very strongly opposed to the proposed Silica mine in Springfield. The risk to the aquifer far outweighs any potential gains to the province or LGD. We cannot risk contamination or depletion of the aquifer that supplies so many in SouthEast Manitoba. This is especially true with the threat to aquifers from climate change. An alternate water supply would be impossible to provide. In addition, the road infrastructure is not sufficient for the proposed mine. This poses a significant safety risk and infrastructure cost that is not sufficiently recognized in the mine evaluation. Do not approve this mine.

Sincerely,
Don Ans

After reviewing the plan and information on the extraction of silica salt and taking into consideration the possible water treatment deficiencies which can occur while extracting the silica ,such as upstream and downstream issues, drainage which can mobilize heavy metals and the usage of Polyacrylamide (PAM) which when used as degrades and turns into a neurotoxin, surface water contamination (which we've proven can effect community wells with 24 square kilometres, ex. The Rockwood Sensitive area)I don't see how implementing this is a safe deployment or beneficial for the surrounding communities. 64 000 people use this area for their drinking water and this type of project does not lend a hand to the sustainability of the environment or the people who live in it. There needs to be a better environmental assessment then the one that was currently reviewed and to say it's minor in magnitude and mitigable should not be acceptable language used in a situation where it can effect entire communities and families. The mere fact that this is an environmental liability which can damage an entire aquifer, is the damages that it could possibly impose on the surrounding communities pushed aside as mitigable as well? Should a negative impact happen, such as effecting Brokenhead River

and Lake Winnipeg, what is CanWhite Sands Corp. prepared to do to compensate the damages to not only the surrounding environment but the citizens who reside within it. This proposal needs to be re-evaluated as it effects much of Southeastern Manitoba, and I believe is negligible. A responsible conscious decision needs to be bought forth since it impacts so many Manitobans. This is a very serious matter and one that warrants a step back and an in-depth review.

Respectfully,

Janice Gray

I am a Manitoban and absolutely do not support the fracking industry, extracting sand from essential aquifers and an underhanded stage licencing process that poses an unacceptable risk to our water and climate.

Sand to operate this sand cleaning plant doesn't appear by magic and we need to have the sand mining included in environmental assessment.

Stage licencing is underhanded, secretive, and against the public interest.

Mining the sand from deep underground in the aquifer where it has been safely filtering our groundwater for thousands of years is a terrible idea. Water is sacred.

We should not be mining our groundwater aquifers! Water is life.

Under no circumstance can we mine sand in Manitoba for fracking. All elected officials should take a stand against the expansion of this destructive process.

Unless this sand plant can prove it is not using the sand for fracking, it must not be given a licence.

Yours truly,

Peggy Kasuba

I do not support this project!

Sand to operate this sand cleaning plant doesn't appear by magic and we need to have the sand mining included in environmental assessment.

Stage licencing is underhanded, secretive, and against the public interest.

Mining the sand from deep underground in the aquifer where it has been safely filtering our groundwater for thousands of years is a terrible idea. Water is sacred.

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Yours truly,

Nancy Kasuba

I understand that many of us are concerned about the economy - especially right now. However, I really believe this deal has been rushed through with little consideration for the long term environmental impacts. The world is slowly realizing that depending on resource extraction is not sustainable. As Manitobans, we have had fewer opportunities to make economic gain from polluting exploitive industries (mining and Hydro flooding of Indigenous lands aside). I would love to see us not go down that road, respect the land, and continue to develop less harmful economies.

Yours truly,

Jennifer Porter

I can no longer stomach the tripe that gets submitted by hired guns, and approved by complicit public servants in order to disguise the treachery of reckless politicians. In recent months I have been abused by this process on the files of Parrish and Heimbecker and Berger Peat Moss. It has been unpleasant. So, I will not waste my time, as I would normally do, on the 129-page tome submitted by CanWhite to sanitize its grotesque impact upon Mother Nature in eastern Manitoba. Others can do that. I am worn out being a victim of my government, and the people hired to serve me.

Here is what I have to say, pay attention:

1. In 1997, Justice Horace Krever reported on the tainted blood scandal. His words have resonated through the years. **“The relationship between a regulator and the regulated must never become one in which the regulator loses sight of the principal that it regulates in the public interest and not in the interests of the regulated”**. Go ahead, make my day, read that again...out loud...to your colleagues.
2. It is terminally treacherous to allow a license for a sand factory before determining that the land can safely provide its feedstock. It is gobsmackingly arrogant. It is professionally negligent.
3. Not long ago, Feisal Somji, the CEO of CanWhite appeared before potential investors in a forum provided by Noble Capital Markets of Florida. In that meeting he stated that the silica sand to be mined in eastern Manitoba was destined for fracking operations in Alberta and North Dakota. He made reference to enormous amounts of sand transported to the fracking fields. There was no significant mention of the modest, boutique uses of sand that now dominate its rather dismal website for consumption by a mostly gullible public. Somji asserted that his goal is to create a profitable enterprise and then flip it to a large American frack sand competitor. Disregarding this at the peril of Manitobans is not your assignment.

There are 2 geological ages tragically linked by the CanWhite proposal. The **Pleistocene** epoch ended 11,000 years ago. As the ice sheets withdrew they left behind the sand from which

CanWhite seeks to profit. And the spectacular water that we... um... drink. Every day. The **Anthropocene** epoch began with the Industrial Age, but has proceeded with abandon such that human activity is now the most dominant influence on the natural environment. It would be nice if civil servants grasped this fundamental, or returned your diplomas and degrees to the issuing institution.

Yours truly,
C. Hugh Arklie

This CanWhite application for their processing facility is isolated from but predicated on their unproven 'sand slurry' extraction mining processes which need to be reviewed prior to or at least concurrently.

The impetus for mining Vivian silica sand is it's high purity and high demand for fracking in the gas and oil sector as pitched by CanWhite CEO Feisal Somji in a video to investors. Also stated was CanWhite's intention to sell this venture as soon as it was marketable for profit taking. This has since been denied by COO Brent Bullen who states that CanWhite's market emphasis is the "green tech sector" and long term .

CanWhite's application states several times that their processing plant will be available to "be operated on a commercial basis to process and transfer sand not mined by the same owner". This changes the thrust of their application substantially-allowing for sand mined elsewhere by other methods, requiring transportation to their site. This implies a hidden agenda for allowing other factors be covered off but not set out in this application.

The greatest threats that CanWhite's project poses is;

- 1) Contamination of the aquifers by add mixing degraded shale, air pressure and water all being concentrated in their 'closed loop systems' creating acidic conditions that will leach out harmful minerals i.e. arsenic etc.
- 2) 2400 wells peppered into the aquifers in close proximity to their plant. Even their exploratory wells have not been properly sealed and are conduits for aquifer contamination.
- 3) major disruption to the environment to establish wells sites and pathways for the slurry lines. Their current sites show little regard regulations-trees bulldozed against live timber, untidy sites, etc.
- 4) their disregard for securing their high hazard silica sand piles from wind erosion and being played in by recreational intruders.
- 5) lack of honesty and responsible business practices by CanWhite to date speak volumes about them not being good partners in this enterprise regardless of assurances going in.
- 6) When things go off track and they will our experience shows that we have little recourse to address the issues considering the current state of provincial enforcement.

Please deny the major environmental chaos that CanWhite Sands is about to visit on Springfield.

Thanks,

Darryl Speer

My family and I live in the southern part of Brokenhead Municipality (NE 16-12-8 1E). We are concerned about the potential impact of this silica sand operation on ground and surface water. While the processing operations themselves are not likely to affect my family's drinking water, the associated silica sand mining operation may. Therefore, my first request is that this proposal not be evaluated in isolation, but be considered together with the impacts of the silica sand mining operations. We have a well that is approximately 100 feet deep and provides us with water of exceptional quality for all of our domestic and farming needs. Given that many thousands of Manitobans besides ourselves rely on the groundwater that lies below the area proposed for silica sand mining and processing, every precaution must be taken to safeguard water quality, regardless of cost.

I urge the Manitoba government to refer all activities associated with silica sand extraction and processing to the Clean Environment Commission.

Secondly, I urge the Manitoba government to assess the full climate change impact of this silica sand mining and processing operation. While the natural gas consumed for drying the sand appears to have a small impact on global warming when compared to Manitoba's total greenhouse gas (GHG) emissions, it is nonetheless an increase in GHG emissions at a time when the Manitoba government is struggling to achieve its legislated Carbon Savings Account target. In addition to the GHG emissions from the drying of the sand there will be additional emissions from motorized vehicles on site and from the transportation of the sand by rail. The 17 hectares of land that will be cleared for the processing facility operations will also lose ecosystem carbon as a result, thereby adding carbon dioxide to the atmosphere.

Sincerely,
Matthew Wiens

It has become patently clear that the petroleum industry is a dying industry that is costing society economically and ecologically.

NOTHING that perpetuates this obsolete destructive behaviour should be tolerated let alone encouraged.

Yours truly,

Gerry Smerchanski

This should not be allowed as its dangerous to so many mb residents. The negative effects are going to be felt further then just the RM of Springfield. Please do not let this happen so a business (that's not even MB based) can make money at the expense of locals health. Stop this from happening before its too late.

Yours truly,

Ally Johnston

I am a resident of Springfield and I am very concerned about this project and how it could affect our water system especially because I am on a well. It also could have very many harmful environmental factors. I am not in agreement with this project and hope other residents have emailed also. There should be more information provided and counsel meetings to take to a resident vote.

Thankyou

Chelsey &Anthony Domienik

I am writing in regard to the Vivian Sands Project proposed for the Springfield area in Manitoba. Mining the sand from deep underground in the aquifer where it has been safely filtering our groundwater for thousands of years is a terrible idea.

Groundwater aquifers should not be mined. Water is essential and must be protected.

Under no circumstance can we mine sand in Manitoba for fracking. All elected officials should take a stand against the expansion of this destructive process.

I am opposed to the extraction of sand from essential aquifers, the fracking industry and any process that poses a risk to our water and climate.

I will not support any government that allows this project (or any project like it) to go forward.

Yours truly,

Charlene Currie

Ridgeland Aqua Farms in the Rural Municipality of Springfield is located approximately 10 miles from Vivian, MB. We have been producing arctic char since 2007. In 2006 we converted an old hog barn into a fish barn and have continued to expand our operation ever since. In 2017 we began investing Millions of dollars in a state of the art Aquaculture facility, one of only few existence in North America. We produce high-quality arctic char for Manitoban and Canadian markets. Our facility is in the early stages of being filled to capacity and we are very satisfied with the quality of our product which relies on the pure, clear water we are currently accessing from our local aquifer. Our livelihood is also dependent upon raising layer hens, dairy cows, pigs and sheep who all rely on this water source. Our school, communal kitchen and residences also access this source of pure clear water. All of our water permits are in place and meet with provincial and municipal regulations. It has recently come to our attention that a company from Alberta named Canwhite Sand Corp wants to process silica sand in our area, extracting over a million tonnes of sand and seven million cubic meters of water annually. We are opposed to this

proposal and extremely concerned about contamination and other effects this could have on our water supply.

Ridgeland Colony

Mark Waldner

I have reviewed the application submitted and do not agree with the conclusions reached by the applicant's consultants.

I continue to stand by the contents of my letter to your branch dated May 26, 2020, addressed to the Director (Acting), Environmental Approvals Branch (the letter and its attachment are attached hereto).

The basic problem is the "foot in the door" approach that seeks to obtain Provincial Approval for the surface part of the project without clearly knowing the subsurface impacts. It is clearly the hope of the Applicant Corporation that one Provincial approval will then weigh in favour of the subsurface licencing. That approach is unreasonable, although sadly all too common. There is no actual hurry here. The sand will not disappear. And the President of the Applicant has been clear in saying that they will sell their interest shortly after final approval. One expects that plan to remain unchanged no matter whether the two applications are joined. So where is the hurry that requires Manitoba to use this Application to help leverage the anticipated and necessary second application?

I respectfully submit that Manitoba should postpone any licencing or finding respecting this application until the second application for the subsurface part of the project is available for consideration. There is considerable public concern about this project evidenced in a myriad of manners. For example: Manitoba's leading environmental biologist has published her opinions. Dr. Pip has at the least asked the Province to approach this project with extreme caution. For another: The Carillon online newspaper, based in Steinbach, has polled its readers with the following Question:

Should Manitoba's conservation minister convene the Clean Environment Commission to assess the proposed silica sand mine near Anola?

84% of respondents answered "yes" to this question as of August 25, 2020.

Then there is the history of fraud which Mr. Feisal Somji and his staff at CanWhite Sands have engaged in elsewhere. Nothing prohibits the Province from taking this factor into account. And there is no limitation on the Province's discretion to engage the Clean Environment Commission to concurrently look at both of the applications simultaneously, nor upon the discretion of the Minister in require participant assistance. Mr. Somji's history rather argues in favour of utilising both of these options and it is my recommendation that they be invoked.

Sincerely

Brian J. Pannell