

September 10, 2020

**Our Reference**  
Project No. 60625356

Jennifer Winsor P. Eng.  
Environmental Engineer  
Manitoba Conservation and Climate  
Environmental Approvals  
1007 Century Street  
Winnipeg MB R3H 0W4

**RE: Vivian Sand Facility Project – Environment Act Proposal (EAP) Application File: 6057.00: Updated Rail Loop Design Information**

Dear Ms. Winsor,

On behalf of CanWhite Sands Corp. ('CanWhite'), this letter provides updated information on the rail loop component design.

During the design and environmental assessment of the Processing Facility a number of different designs for the rail loop were evaluated. This included refinements in placement, shape, width and length of the rail loop to identify a design that would best fit the physical, environmental and operational constraints of the Project Site. One of the original rail loop designs that was considered was shown in Figure 1-2 (attached) in the Vivian Sand Facility Project EAP. During the course of the environmental assessment and development of the EAP this loop design was slightly revised immediately prior to the submission of the EAP to Manitoba Conservation and Climate, Environmental Approvals Branch (MBCC, EAB) in July 2020. This revised version of the rail loop was considered to address potential noise issues with the original rail loop design as shown in the EAP. This revised version, which is smaller (narrower) and located further away from the nearest residences east of the Project Site, was the design that was included and assessed in the Noise Impact Assessment which was included as Appendix C of the EAP. However, in the EAP submission the original larger rail loop design (which would represent the "worst-case" noise scenario) was the version that was presented in the main EAP document. The smaller loop that is presented in the Noise Impact Assessment is the loop that was intended to be included in the main body of the EAP submission and remains to be the targeted design. AECOM apologizes for this oversight.

The revised, smaller rail loop from the Noise Impact Assessment (Figure 1-1 of Appendix C of the EAP) is attached. Although the incorrect figure was included in the main body of the EAP, the information provided in Section 6.3.3 (Noise) in the EAP remains unchanged as the smaller rail loop design from Appendix C of the EAP was used to complete the noise modelling and environmental assessment for this Project.

Since submission of the EAP, more detailed drawings for CN Rail's review and approval for the rail loop have been completed. The more detailed rail loop design figures identified as 'Rail Concept Option 4' are attached as Figure 1 and Figure 2 for your reference and is the rail loop represented in the Noise Impact Assessment in the EAP. 'Rail Concept Option 4' also includes two short inner tracks that serve as service/maintenance track for CN Rail use only. This is a requirement by CN Rail. There are no railcar loading facilities situated over this section of track.

The 'Rail Concept Option 4' is the design used in our findings of our Noise Impact Assessment (Appendix C of the EAP) and therefore our noise assessment in the main body of the EAP does not change.

Based on the more detailed rail loop drawings (attached 'Rail Concept Option 4'; Figures 1 and 2), the calculated footprint area for the rail loop will be approximately 3 ha smaller than the footprint of the rail loop as presented in Table 6.4 of the EAP. The estimated footprint of all infrastructure components

(including the rail loop) in the original proposed design and the revised design, as would be presented in Table 6-4 of the EAP, are summarized below:

**Table 6-4: Estimated Area of the Project Footprint (Original)**

| Project Components                                                                                                     |                  |
|------------------------------------------------------------------------------------------------------------------------|------------------|
| <b>Permanent Components</b>                                                                                            | <b>Area (ha)</b> |
| Processing Facility including the Wet Plant, Dry Plant and associated components as listed in <b>Section 1.1</b>       | 6.9              |
| Permanent access road (7 m wide x 1 km long)                                                                           | 0.7              |
| Rail loop (approximate 30 m width footprint to accommodate curvature of loop line of sight X 3.5 km rail track length) | 10.5             |
| <b>Total Project Footprint Area</b>                                                                                    | <b>18.1</b>      |
| <b>Total Previously Cleared / Disturbed Area with Project Footprint Area</b>                                           | <b>1.1</b>       |
| <b>Total Naturally Vegetated Area Requiring Clearing to accommodate the Project Footprint</b>                          | <b>17.0</b>      |

**Note:** Total land area within the Project Site within which project components will be located is 114 ha.

**Table 6-4: Estimated Area of the Project Footprint (REVISED, with 'Rail Concept Option 4' Rail Loop Design)**

| Project Components                                                                                                    |                  |
|-----------------------------------------------------------------------------------------------------------------------|------------------|
| <b>Permanent Components</b>                                                                                           | <b>Area (ha)</b> |
| Processing Facility including the Wet Plant, Dry Plant and associated components as listed in <b>Section 1.1</b> .    | 6.9              |
| Permanent access road (7 m wide x 1 km long)                                                                          | 0.7              |
| Rail loop (approximate 28.5m width footprint to accommodate curvature of loop line of sight 2.6 km rail track length) | 7.4              |
| <b>Total Project Footprint Area</b>                                                                                   | <b>15.0</b>      |
| <b>Total Previously Cleared / Disturbed Area within Project Footprint Area</b>                                        | <b>1.1</b>       |
| <b>Total Naturally Vegetated Area Requiring Clearing to accommodate the Project Footprint</b>                         | <b>13.9</b>      |

**Note:** Total land area within the Project Site within which project components will be located is 114 ha.

As noted in the EAP the naturally vegetated area within the inside of the rail loop will be retained to the maximum extent feasible. Vegetation will only be cleared to accommodate the rail infrastructure and the required line of sight for the railcars. Culverts will be placed, as required, to ensure no change in natural water drainage and flow.

As shown in the attached 'Rail Concept Option 4' Figure 1, the total area including the footprint of the rail loop and all land area within the rail loop including the rail spur<sup>1</sup> connecting the rail loop to the existing CN Rail mainline is 47.1 ha. This area is 2.9 ha smaller than the minimum required total area of a 'railway yard' to be considered for federal review (total area of 50 ha or more), as described in the *Physical Activities Regulations* of the federal *Impact Assessment Act*. Based on the total area of the rail loop, which including the rail spur is less than 50 ha, in addition to our opinion that the proposed rail facilities for the Project do not constitute a 'railway yard', it is our opinion that this Project does not meet the criteria to trigger a federal review by the Impact Assessment Agency of Canada.

If you have any questions regarding the revised rail loop design, please contact me at your earliest convenience.

<sup>1</sup> The rail spur will be developed by CN Rail and is not part of the proposed Vivian Sand Facility Project.

Yours sincerely,



Marlene Gifford  
Biologist, Environmental Assessor  
AECOM Canada Ltd.  
T: 204-928-9210  
E: marlene.gifford@aecom.com

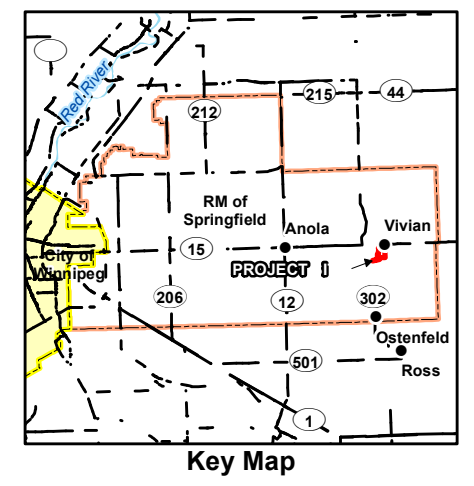
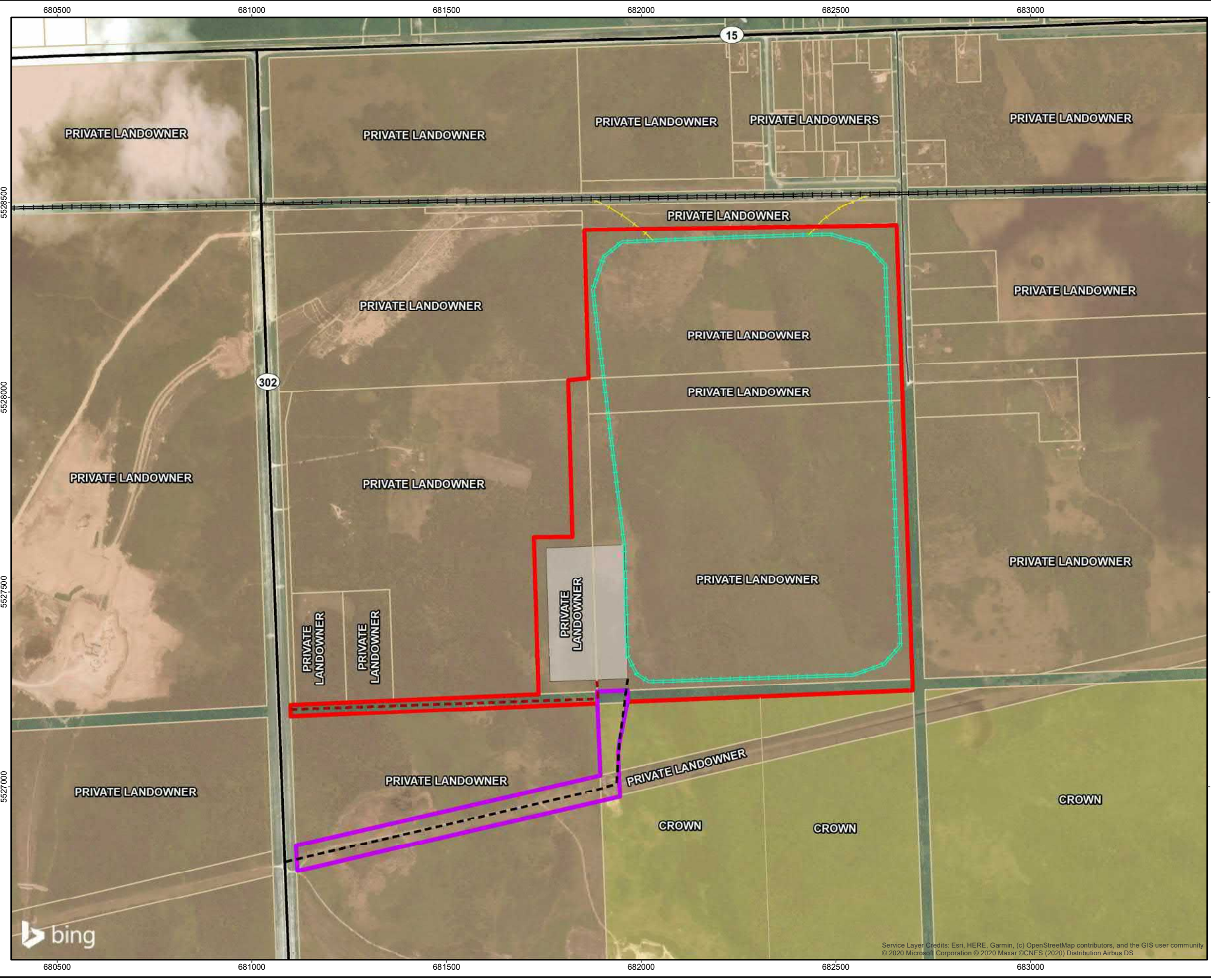
**cc:**

Siobhan Burland Ross (Manitoba Conservation and Climate, Environmental Approvals)  
Feisal Somji (CanWhite)

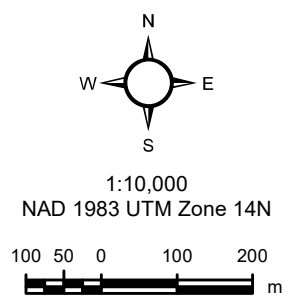
**Attachments:**

- Figure 1-2 from the Vivian Sand Facility Project EAP
- Figure 1-1 from Appendix C (Noise Impact Assessment) from the Vivian Sand Facility Project EAP
- Rail Concept Option 4 - drawing: Figure 1
- Rail Concept Option 4 - drawing: Figure 2

Last saved by: PAIGE.CROSSMAN | (2020-06-30) | Last Plotted: Tue Jun 30, 2020  
 Filename: L:\ENVIRONMENT\GIS\STEPHANIE.CLARKE\WINNIPEG\WIVIAN\_00625656102\_MXD\SIVIVIAN SAND FACILITY PROJECT\H001-2\_60625656\_FACILITY\_SITELLOCATION\LANDOWNERSHIP.MXD  
 Project Management Initials: Designer: Checked: Approved: ANS/B 279.4mm x 431.8mm



- Legend**
- Project Site
  - Project Site – Temporary Use
- Project Components**
- Wet Plant and Dry Plant Location
  - Rail Loop
  - Train Spurs
  - Permanent Access Road
  - Temporary Access Road
- Land Ownership**
- Crown Land
  - Private Land
- General Features**
- Highway
  - Road
  - Canadian National Railway
  - Land Parcels



Basemap: Canvec; CanWhite Sands Corp., 2019  
 This drawing has been prepared for the use of AECOM's client and may not be used, reproduced or relied upon by third parties, except as agreed by AECOM and its client, as required by law or for use by governmental reviewing agencies. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that modifies this drawing without AECOM's express written consent.

**Legend**

- Access Road
- Rail Loop
- Facility

UTM Zone 14N, NAD 83

This drawing has been prepared for the use of AECOM's client and may not be used, reproduced or relied upon by third parties, except as agreed by AECOM and its client, as required by law or for use by governmental reviewing agencies. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that modifies this drawing without AECOM's express written consent.

CanWhite Silica Sand Extraction Project  
Vivian, Manitoba

0 55 110 220 330 440 m

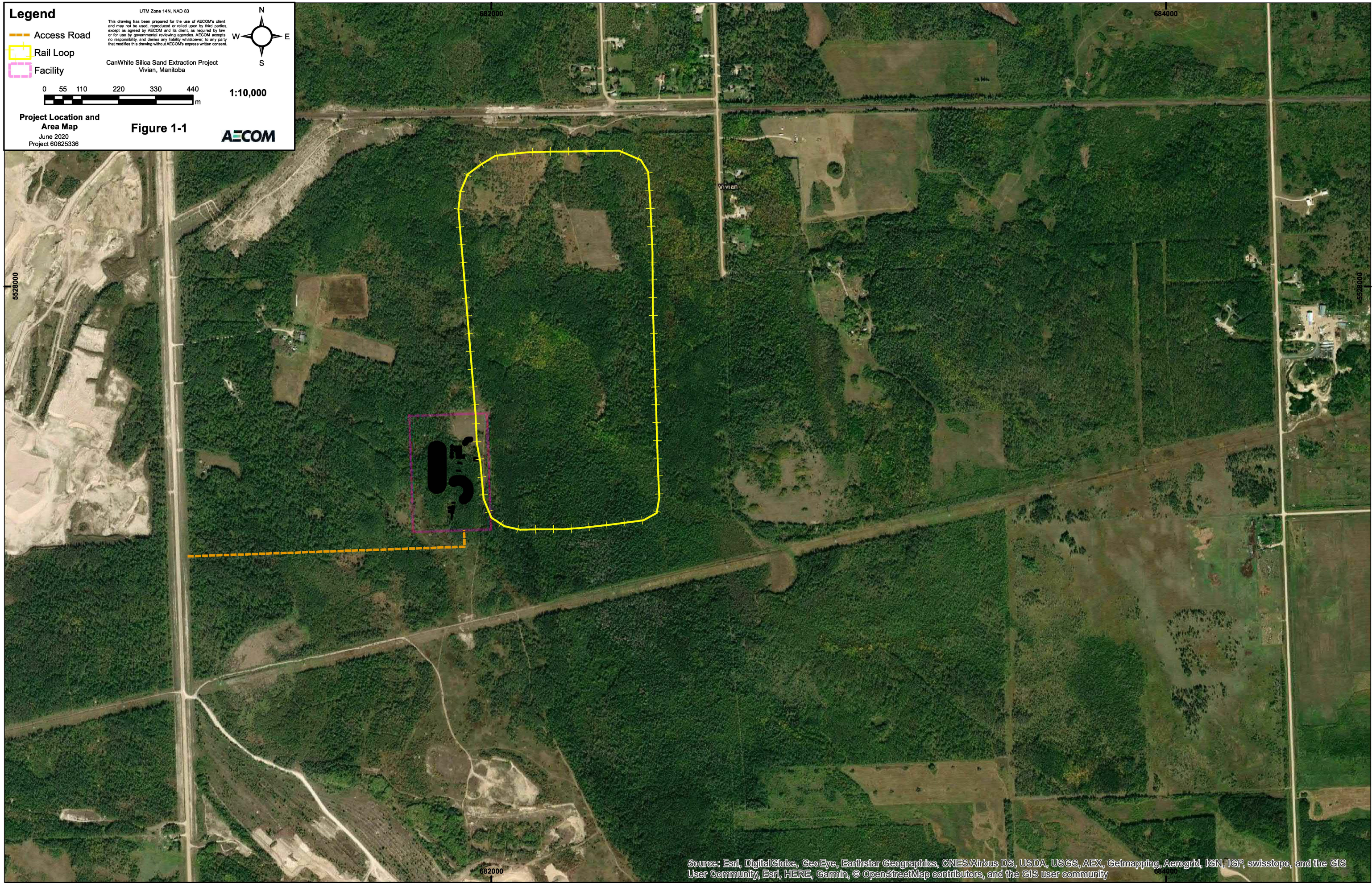
1:10,000

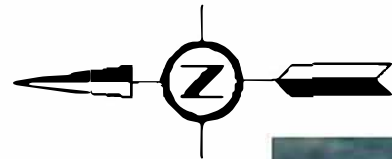
**Project Location and Area Map**

June 2020  
Project 60625336

**Figure 1-1**

**AECOM**





**LEGEND**

- AREA BOUND BY OUTER LOOP**  
=7.4ha
  - AREA BOUND BY INNER LOOP**  
=39.5ha
  - AREA BOUND BY CN R/W**  
=0.2ha
- 
- TOTAL = 47.1ha**

Figure 1

C:\USERS\JSCOT\DROPBOX\JSM DESIGN\PROJECTS\CLIENTS\TRI\TRANSENERGY\RL-SPN-00002.DWG LAST SAVED DATE: 2020-09-09 3:38:06 PM BY: JSCOT PLOTTED DATE: 2020-09-09 3:42:05 PM BY: JSCOT

\*DISPLAYED SCALES ARE ONLY ACCURATE WHEN PLOTTED AS ANSI D SIZE (22"x34"), SCALES SHALL BE DOUBLED WHEN PLOTTED ON ANSI B SIZE (11"x17")

NOTES:  
1. COORDINATES SHOWN ARE FOR REFERENCE AND HAVE NOT BEEN SURVEYED.

| REV. | REVISION DESCRIPTION | BY | DATE       | CHD | APPD |
|------|----------------------|----|------------|-----|------|
| A    | ISSUED FOR APPROVAL  | SM | 2020-09-04 |     |      |
|      |                      |    |            |     |      |
|      |                      |    |            |     |      |
|      |                      |    |            |     |      |
|      |                      |    |            |     |      |

ENGINEER'S STAMP



PROJECT NO.: XXX.01.01

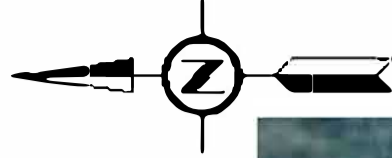
|      | DRAWN      | CHECKED | DESIGN | APPROVED |
|------|------------|---------|--------|----------|
| BY   | SM         |         |        |          |
| DATE | 2020-09-04 |         |        |          |

PERMIT NO.:

TRANSENERGY

RAIL CONCEPT OPTION 4  
RAIL LAYOUT  
OVERALL SITE PLAN  
AREA SKETCH


| SCALE  | DRAWING NUMBER       | REV. |
|--------|----------------------|------|
| 1/2500 | XXX0101-RL-SPN-00002 | A    |



**TRACK LENGTHS**  
 A/D TRACK 1 = 2,611m  
 A/D TRACK 2 = 1,882m  
 SERVICE TRACK 1 = 411m  
 SERVICE TRACK 2 = 561m  
 CONNECTION TRACK = 304m  
 ENTIRE LOOP TRACK LENGTH = 2,611m

C:\USERS\JSCOT\DROPBOX\JSM DESIGN\PROJECTS\CLIENTS\TRI\TRANSENERGY\RL-SPN-00001.DWG LAST SAVED DATE: 2020-09-09 3:39:24 PM BY: JSCOT PLOTTED DATE: 2020-09-09 3:40:22 PM BY: JSCOT

Figure 2

|                                                                                                                                          |  |      |                      |    |            |     |      |                  |                                                                                                                 |             |                                                                     |          |        |                      |      |
|------------------------------------------------------------------------------------------------------------------------------------------|--|------|----------------------|----|------------|-----|------|------------------|-----------------------------------------------------------------------------------------------------------------|-------------|---------------------------------------------------------------------|----------|--------|----------------------|------|
| *DISPLAYED SCALES ARE ONLY ACCURATE WHEN PLOTTED AS ANSI D SIZE (22"x34"), SCALES SHALL BE DOUBLED WHEN PLOTTED ON ANSI B SIZE (11"x17") |  | REV. | REVISION DESCRIPTION | BY | DATE       | CHD | APPD | ENGINEER'S STAMP | <br>PROJECT NO.: XXX.01.01 | TRANSENERGY |                                                                     |          |        |                      |      |
| NOTES:<br>1. COORDINATES SHOWN ARE FOR REFERENCE AND HAVE NOT BEEN SURVEYED.                                                             |  | A    | ISSUED FOR APPROVAL  | SM | 2020-09-04 |     |      |                  |                                                                                                                 |             | RAIL CONCEPT OPTION 4<br>RAIL LAYOUT<br>OVERALL SITE PLAN<br>SKETCH |          |        |                      |      |
|                                                                                                                                          |  |      |                      |    |            |     |      |                  | DRAWN                                                                                                           | CHECKED     | DESIGN                                                              | APPROVED | SCALE  | DRAWING NUMBER       | REV. |
|                                                                                                                                          |  |      |                      |    |            |     |      |                  | BY                                                                                                              | SM          |                                                                     |          | 1/2500 | XXX0101-RL-SPN-00001 | A    |
|                                                                                                                                          |  |      |                      |    |            |     |      |                  | DATE                                                                                                            | 2020-09-04  |                                                                     |          |        |                      |      |
|                                                                                                                                          |  |      |                      |    |            |     |      | PERMIT NO.:      |                                                                                                                 |             |                                                                     |          |        |                      |      |