

**CanWhite Sands – Silica Sand Extraction Project Environment Act Proposal –
File No. 6119.00
Public Comments Received From**

Kathleen M Bell

Darrell Henzel

Dennis LENEVEU

Sue Ziemski

Hello. I am voicing my heartfelt concerns regarding the above mentioned project. It is my firm belief that if this project is allowed to proceed that our pristine water supply will be jeopardized.

I am concerned for the well being of my grandchildren and future generations.

Kathleen M Bell

I own property in Piney and in Tache Manitoba. We do not need another Alberta disaster such as the oil sand project. Sorry not in my back yard. Who is going to compensate us when Vivian claim's bankruptcy and leave us sick with contaminated water and land. I'm sick and tired of the oh well excuse.

With regards to the silica sand extraction project I would like to ask that you do not grant CanWhite Sands Corp an environmental license to proceed in the drilling/ silica sand removal from our aquifer.

The idea that we would allow our precious water resources to possibly and more than likely become contaminated by this company for their sole purpose of extracting silica sand for the next 24 years is preposterous. A millennium of future water service can be destroyed in 24 years. Even the company Friesen Drillers who were contracted to perform test wells have come up with some very serious concerns about what CanWhite is saying concerning the reintroduction of UV treated groundwater released back into the aquifer. Plus Friesen Drillers does not see that CanWhite would be able to keep water from one Aquifer from getting into the other aquifer.

Why would we want to allow the drilling of 467 extraction wells each year for 24 years? Those are punctures into our aquifer through the protective lining that keeps our water pure.

Please do not let this company proceed. Our water is our life blood.

thanks for your consideration

Sue Ziemski

Cooks Creek

**Questions for CanWhite Virtual Open House for the Vivian Sand Extraction Project
and Hydrogeological Report
by D.M. LeNeveu B.Sc. (hons. physics) M.Sc. (biophysics) B.Ed.
Aug. 20, 2021**

1. Subsidence

The Can White Sands Corporation (CWS) Extraction EAP written by AECOM recognizes that subsidence of the extraction holes with design diameter of 54 meters may be a problem. The EAP states;

“Results of a geotechnical assessment based on preliminary exploratory drilling associated with this Project from 2017 to 2021 indicated that the overlying carbonate (limestone) geological layer needs to be at least 15 m thick to minimize the possibility of surface subsidence during sand extraction activities (Stantec, 2019; 2020; 2021).”

The Stantec reports are not available to substantiate this claim. The CWS hydrogeological study states;

“Removal of the sand will form a void in the shape of a cone extending from the bottom of the Carman Sand Member to the base of the Winnipeg Shale. The pattern of extraction cones is planned to extend laterally by successively extracting from new boreholes across the extraction area in a “room and pillar” style in accordance with the geotechnical model.”

The geotechnical model is not given.

A peer reviewed paper by Waltham and P. Fookes specifies that minimum stability thickness for limestone above a cavity must be 70% of the cavity opening dimension excluding overburden cover.¹ For the CWS standard design opening for a seven well extraction cluster the limestone thickness must be at least 37.8 m. The limestone of the carbonate aquifer in the Bru extraction area has a thick overburden cover of glacial till whose unsupported weight will increase the minimum stability thickness for the limestone.

Figure 1 shows the limestone thickness of the carbonate aquifer in the Bru extraction area and the Stantec and Waltham and Fookes thickness limits. The data was taken from CWS well records supplied by Manitoba Groundwater and from the CWS borehole records in the hydrogeological report. The well records demonstrate that over the entire Bru extraction area all limestone thicknesses are less than the minimum criteria stated by Waltham and Fookes for stability. All limestone thicknesses in the eastern Bru area where extraction activities will begin are less than the Stantec limit of 15 meters. The limestone thickness in general increases westward.¹³

A report released by What the Frack Manitoba in February 2021, peer reviewed by A. Ingraffea of Cornell University a world renowned expert on geo-mechanics, determines the shale aquitard will be unstable and slake into the cavity from the sand extraction.²

The CWS hydrogeological report in section 4.3.2 states

“It is possible that project operations will result in increased hydraulic communication between the Red River Carbonate and the Winnipeg Sandstone within the Project Area due to fractures and borehole annuli that may extend across the Winnipeg Shale aquitard. Degradation of the Winnipeg Shale could lead to a

more interconnected aquifer system comprising the Red River Carbonate aquifer and the underlying Winnipeg Sandstone aquifer.”

This statement confirms the shale aquitard could be compromised.

The glacial till overburden will gradually migrate into the cavity through the compromised limestone layer causing a cover collapse condition. In cover collapse subsidence the cavity created in the till overburden by gradual migration through the limestone layer will suddenly collapse at some undetermined time in the future leaving a large sinkhole as illustrated in Figures 2 and 3. All of the well clusters created by CWS operations are susceptible to cover collapse. A moonscape of water filled sinkholes will be eventually created. Water contaminated iron bacteria, fecal coliform from septic fields and animal feces, other microbes, and chemicals from surface runoff will have direct access to the carbonate aquifer and the sandstone through the compromised shale aquitard. This subsidence scenario is untenable.

Question:

Will CWS move their operations westward into the ALY area where the limestone is thicker and the sandstone aquifer is saline to avoid subsidence?

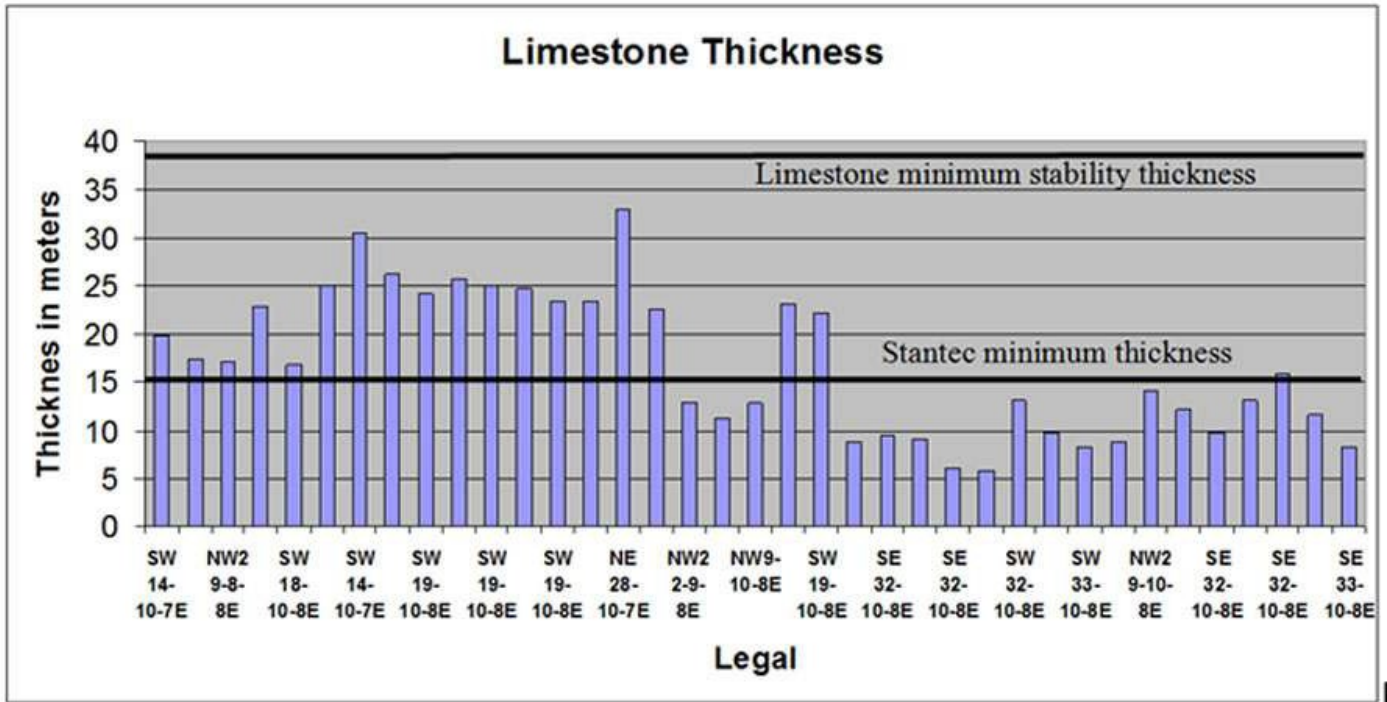


Figure 1. Limestone thickness in the carbonate aquifer of the CWS BRU extraction area.

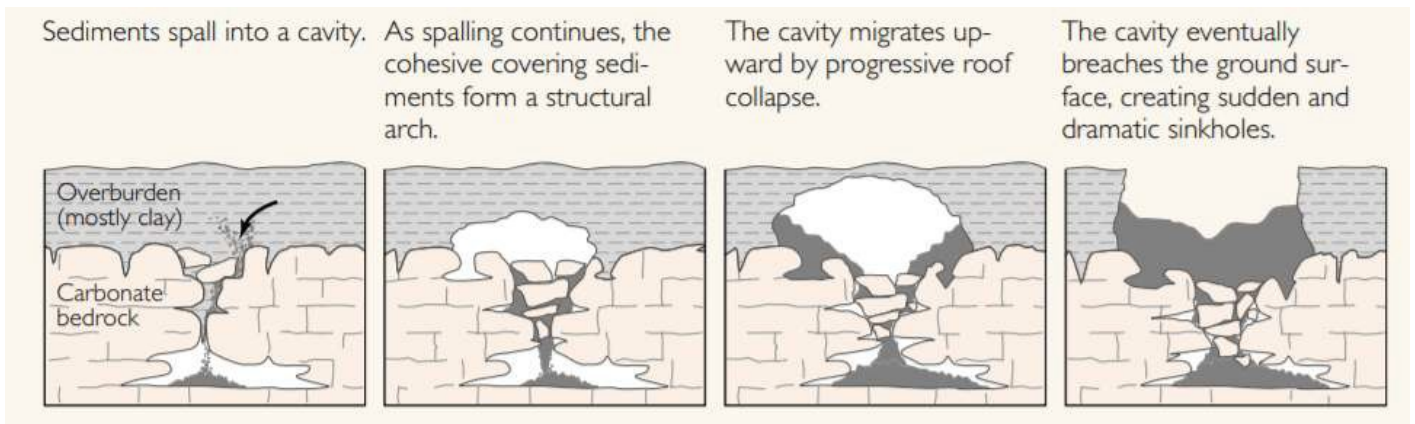


Figure 2. Cover collapse sinkholes from USGS.³

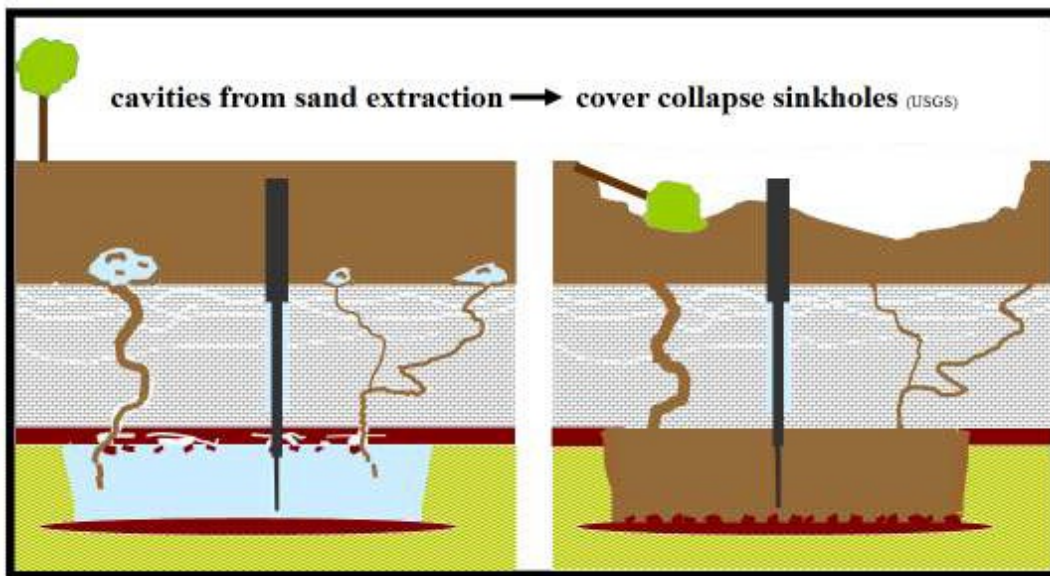


Figure 3. Sinkhole development from CWS sand extraction²

2. UV Light Sterilization

The CWS extraction EAP admits that bacteria and microbes may be introduced into the extracted water that will be re-injected to the sandstone aquifer. The EAP states;

“The groundwater flows past a series of UV lamps that expose the water to UV light and renders all bacteria and other microorganisms inactive. UV light acts very rapidly by rendering any bacteria, viruses or protozoa that may be present inert when they are exposed to the UV light making these organisms, if present, incapable of growing or infecting the water.”

The EAP admits in addition to potential microbes the re-injected water will contain oxygen. The EAP attempts to minimize the effect of this large change in the water chemistry of the aquifer system that is essentially initially anaerobic (no oxygen) by such statements as;

“For some constituents, the impact was simulated to be positive due to reduction of concentrations of iron and manganese when oxygen (air) is introduced into the aquifer or is allowed to mix with water containing lower concentrations of those elements.”

The Government of Australia Department of Health states;⁴

“UV light will only travel in a straight line so any shadow or obstruction will reduce its efficiency. Water that is not filtered can contain iron, manganese and other particles that can either absorb or scatter UV light reducing the effectiveness of the disinfection system. Microorganisms that are able to pass through protected by shadows created by dirt, debris or other microorganisms may be able to survive treatment.”

The Water Research Centre of Dallas Texas gives the following conditions for UV sterilization to be effective⁴

1. Five to ten micron pre-filtration of suspended solids
2. iron concentration less than 0.3 mg/L
3. manganese concentration less than 0.05 mg/L
4. colour – none.

Pre-filtration of the re-injection water with 5 to 10 micron filters would generate a huge filter maintenance and disposal problem for the large amounts of captured filter material. Pre-filtration of the re-injected water with 5 to 10 micron filters is not viable.

The concentration of manganese the water in the sandstone aquifer given in table 4.3 of the hydrogeological study is between 24 and 45 ppm (mg/L). The iron concentration is between 0.22 and 0.65 mg/L. The hydrogeological study states,

“Although the naturally elevated concentrations of dissolved iron and manganese were simulated to decrease in response to aeration or mixing, they may remain elevated above drinking water quality criteria during and following operations”

Thus the concentrations of iron and particularly manganese will not be reduced to acceptable levels for disinfection in the extraction dewatering process where the water becomes aerated.

This evidence demonstrates that the UV radiation will be ineffective and that potentially harmful microbes will be introduced to the aquifer. The re-injected aerated water will provide an environment where the introduced harmful microbes can proliferate contaminating the drinking water.

Question:

How will CanWhite disinfect the water re-injected to the sandstone aquifer given that UV radiation cannot be effective?

3. Core log and Winnipeg Formation sand samples are compromised

All core log samples for the Red River Carbonate aquifer and the Winnipeg Shale aquitard, (Bru 95-8, Bru 121-1 and Bru 146) and sand samples from the Winnipeg aquifer were not protected against oxidation by air. The sand samples from borehole Bru 95-3 were taken from outdoor stockpiles that had been exposed to air, rain and weathering since the well completion date of June 28, 2019 as determined by CWS well reports obtained from MB Groundwater. Sand from Bru 95-3 was extracted by air lift wells that would have exposed the sand to air in the well pipe before reaching the surface.

Samples of sand from the Winnipeg Sandstone from Bru 121 and 146 according to the CWS hydrogeological report had been previously collected and submitted by others to ALS Environmental Laboratories (ALS).

How the samples were collected, at what time and by whom is not given. Pictures of the sand samples in the hydrogeological report are open to the air and the Bru 146 samples show some brown discoloration consistent with oxidation of marcasite coating the sand. (Appendix A part 5). These samples would have likely also been collected by air lift methods and stockpile outside. All sand samples would have been exposed to air during extraction and stockpiling outside.

Air oxidation of pyrite releases sulphuric acid that mobilizes heavy metals that can escape from the samples.⁶ Most of the sulphur remaining in the samples would be in the form of sulphate rather than the original sulphide in the pyrite (FeS₂).⁶ The sulphide determination from oxidized samples will be greatly underestimated. Selenium in the samples would be oxidized by the air to soluble selenates that could also migrate from the samples and be underestimated.⁷ All the geochemical analyses in the hydrogeological report are invalid and cannot be used.

The photographs of the core in Appendix C1 of the hydrogeological are shown open to the air. Bru 95-8 according to the hydrogeological study was drilled Nov. 16 to 19, 2020. The core logs from Bru wells 121 and 141 near Ross MB and St. Anne were taken from historical core log storage in Steinbach. The core boxes shown in the photographs in the CWS hydrogeological study are not air tight. Well records obtained from MB groundwater show well Bru 121 was completed on Feb. 19, 2019. The core logs from Bru 121 well would have been exposed to oxidation since this time. The well records for BRU-146 were not obtained from MB groundwater however since the core logs were kept in the storage in Steinbach the samples would have been exposed to oxidation over a period similar to Bru 121.

A report by PetroWiki⁹ calls for sealing of dry core samples in air tight cans or tubes and core samples in anaerobic jars or polycarbonate, steel, glass, or PVC containers with brine, oil, or other fluids.

Claim Post Resources used a sonic borehole technique to collect sand samples at Wanipigow. The 2014 NI43-101 technical report for Wanipigow documents that the extracted sand was immediately placed in air tight containers upon extraction and sent by closed custody for immediate analysis. The analysis of the protected Wanipigow sand showed 0.235 % sulphide and an NP/AP (neutralizing potential to acid potential) ratio of 0.73 In acid base accounting an NP/AP ratio of less than one that indicates large acid drainage potential.

Electron microscope pictures in the NI 43-101 report at Wanipigow show marcasite a form of pyrite (iron sulphide) coating of the sand grains consistent with the laboratory analysis showing sulphide.¹² A report by Schieber and Riciputi (2005) describes the diagenesis of marcasite in the sandstone over the entire Winnipeg formation. This report also shows electron microscope pictures of marcasite coated sand grains. The samples were taken in the western portion of the Winnipeg formation however the presence of marcasite at Wanipigow verifies that the marcasite formation occurred through the entire Winnipeg formation. The CWS hydrogeological report does not mention the documented occurrence of marcasite in the sand of the Winnipeg formation and the results from Wanipigow. The sand samples taken and analyzed for the CWS hydrogeological report were compromised so that marcasite would have been oxidized and washed away in the outdoor stockpiles.

The stated date of sampling of Bru 95-8 well core was Nov.11, 2020. The analysis date at ALS labs was Jan 5, 2021. The ALS lab reports showed all samples were received on LPDE bags. According to a paper published by Donald et al. (2016) reported in the PMC US National Library of Medicine, National Institute of Health,¹¹ the LPDE bags used for the CWS samples are not air tight. Air oxidation through the bags would have occurred from the sampling date to the analysis date. The core samples for BRU 121, 141 stored in Steinbach in non air tight boxes were exposed to air oxidation for at least one and one half years before the

sampling date. All sand samples were exposed to weathering over a similar period. The ALS reports showed that many samples the analysis date was beyond the recommended time period between sampling and analysis. This information conclusively demonstrates all the geochemical samples analyzed were compromised.

Question:

Will CWS have representative sampling redone and resubmitted by independent experts to ensure the samples are properly handled and sealed in air tight containers immediately upon extraction? Will CWS ensure the sand samples are not exposed to air during extraction and immediately sealed in air tight containers?

4. Carman sands

The CWS hydrogeological report states;

“CanWhite intends to develop and operate an in-situ sand extraction operation in southeastern Manitoba, and approximately 35 km east of Winnipeg. It will involve extraction of sand resources of the Carman Sand Member of the Winnipeg Formation for commercial and industrial use.”

“Black shale is present as part of the Black Island Member of the Ordovician-aged Winnipeg Formation. This unit was typically deposited on top of the Winnipeg Formation, but is not present within the Project Area. a. It is typically composed of up to 50% pyrite nodules, which are rounded, equant to elongate, concentrically layered and 0.5 mm to 1.0 mm in diameter (Lapenskie 2016)”

“Shale from the Project Area were below average crustal abundance criteria, and concentrations were typically one to two orders of magnitude lower than those in Black Island Shale. This clearly indicates that the Winnipeg Shale found within the Project Area has metals concentrations that are significantly lower than the Black Island Shale.”

“The Winnipeg Formation has been subdivided into stratigraphically distinct units with subdivisions generally consisting of a lower sandstone unit (Black Island Member) and overlying units consisting of sandstone and shale layers (Icebox Member). A third unit (Carman Sand Member) is a clean very-fine-to-medium-grained sandstone zone that is up to 30 m thick in the upper portion of the Winnipeg Formation in Southeastern Manitoba. This feature extends from south of Brandon, Manitoba to the subcrop below the Sandilands Area (Ferguson et. al. 2007). CanWhite drilled over 40 boreholes between 2017 and 2020 to characterize local lithology and inform a Preliminary Economic Assessment (Stantec 2019). They found the Carman Sand Member was typically uncemented, well sorted, well rounded, and fine- to medium-grained, with a consistent thickness ranging from 20 m to 30 m.”

The above quote states the Carman Sands are below the Sandilands area. Figure 4 shows the Carman Sands as determined from the Manitoba Energy and Mines Bedrock Geology Compilation Map Series ¹³ overlaid on the CWS 24 year Project area. Figure 4 clearly shows only very southern portion of the project area is within the Carman sands.

According to the report by Watson, Economic Geology,¹⁴ that was recommended in the expert peer review by Friesen states,

“A thickened portion of the upper part of the Winnipeg sandstone near Ste. Anne was tested for possible mining by hydraulic methods. This unit, known as the Carman sand body, varies in thickness and extent. It is

generally about 27 m thick and extends westward from Ste. Anne for about 240 km to Ninette. It ranges in width from 24 to 100 km (McCabe, 197B). The sand in this body is similar to that in the lower Winnipeg at Black Island. It is a separate body, however, and is separated from the rest of the sand section elsewhere by shale rich rocks. The body is probably a former offshore bar and the increased thickness of the Winnipeg section is due to the compaction of the sandstone being less than for the shale-rich sections elsewhere. In 1966, the deposit was drilled in the area east of Steinbach (Fig. 13) by Norlica Minerals Limited (Underwood McLellan and Associates Limited, 1967). The drill holes intersected silica sand intermixed with shale, with high quality sand beneath the upper sand-shale layer. The sand ranged from loose to well cemented. Various methods were tried to loosen the sand, including water jets, suction and a mechanical cutter, in order to pump it from drill holes. These methods were unsuccessful largely due to the presence of hard sandstone and shale layers within the section. The hard layers could not be broken and thereby prevented slumping and breakup of the sand layers between them.”

Thus even the lower portion of the Carman Sands in the southern portion of the claim area is interbedded with shale that is likely rich in pyrite.

Questions:

Does CWS acknowledge the northern part of the BRU project area is wholly within the Black Island member part of the Winnipeg formation known to contain pyritic shale, marcasite coating the sand, pyritic concretions such as oolite layers and not within the Carman sands area?^{10,12,14,15} Does CWS acknowledge that the Black Island member from which sand will be extracted in the northern portion of the Bru area contains pyrite that will be exposed to re-injected aerated water that will form acid and mobilize heavy metals and selenium thereby contaminating the aquifer?

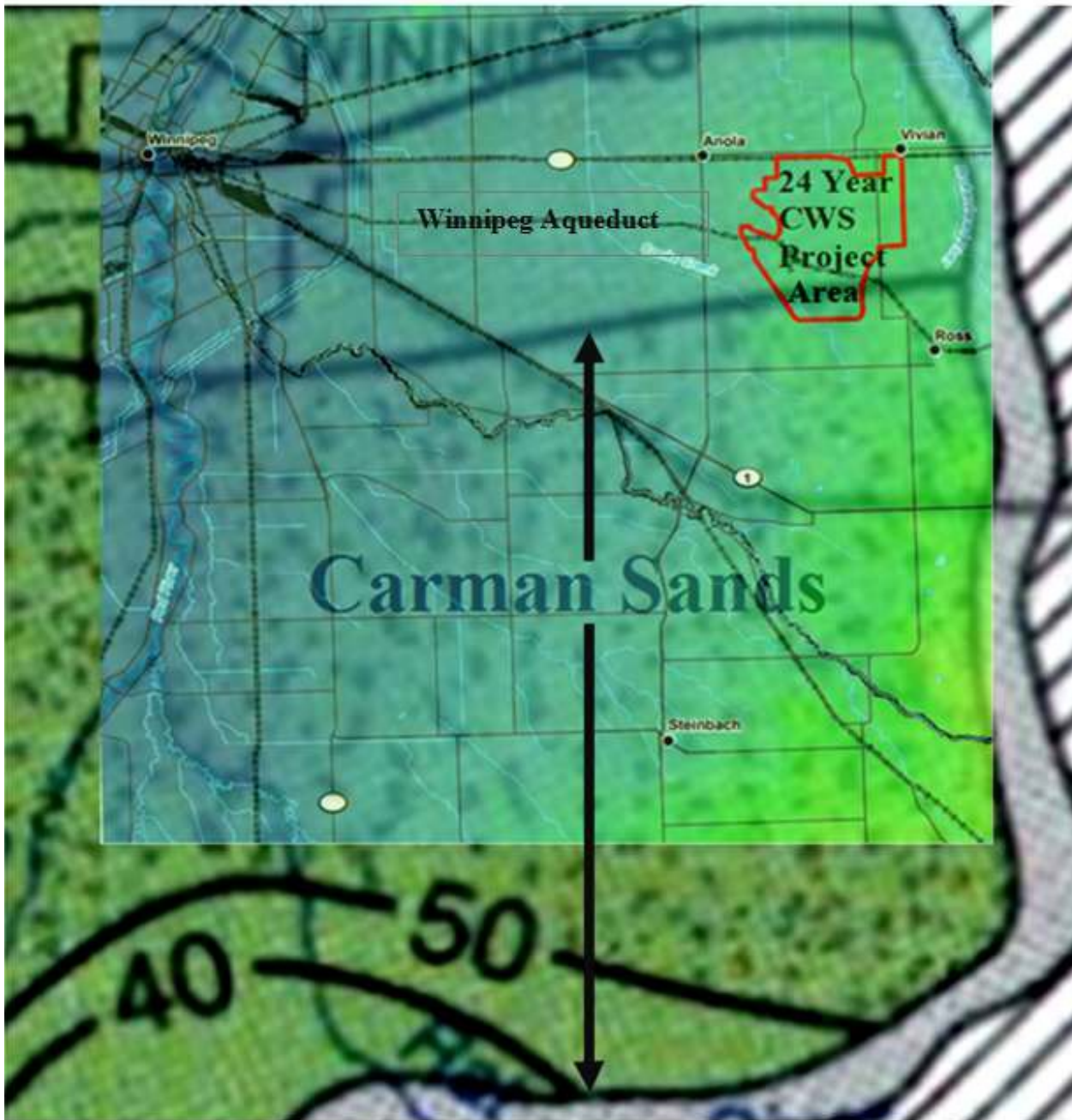


Figure 4. CWS 24 year project area overlaid on the map of the extent of the Carman sands (green speckled area) south of Vivian MB.

5. Geochemical Analysis

The geochemical analysis of samples taken from well cores Bru 95-8, Bru 121-1 and Bru 146 and sand samples from the Winnipeg aquifer were not protected against oxidation by air. Nevertheless some samples showed substantial arsenic, selenium and aluminum concentration. The acid base accounting test to determine the potential for acid formation from sulphide were also compromised however the results were inconclusive. CWS conclude that the shale should be considered as potentially acid generating (PAG).

Figure 4-2 shows a scatter plot of wt% total sulphur versus sulphide indicating that the sulphur content was dominated by sulphate. This is consistent with the oxidation of the samples where the sulphide concentration would be oxidized to sulphate. If the sulphur were originally sulphide before oxidation the original sulphide concentrations would be many times higher. This means that the total acid potential will be underestimated and that the NP/AP ratios determined by the CWS analyses are too high.

The core logs obtained by MB groundwater throughout the Bru all show shale layers at various depths below the extractable sand layer. This is confirmed by figure 2-A of the hydrogeological report that shows a shale layer at the base of the sand layer in the Winnipeg formation. No samples were taken and analyzed of these lower shale layers. Aerated re-injected water would be in contact with these lower shale layers from the Black Island member known to contain pyrite. Oxidation of the pyrite in these lower shale layers would create acid and mobilize heavy metals contaminating the aquifer.

The hydrogeological report also documents concretions that will be screened from the sand. The paper by Schrieber and Riciputi (2005)¹⁰ states;

“Throughout the Black Island Member we find irregular iron sulfide concretions that follow burrow trails. They consist of a mixture of pyrite and marcasite in clusters and coarse aggregates with rounded quartz grains ‘floating’ in the sulfide matrix.”

This illustrates the concretions will contain large amount of sulphide and be acid generating. The concretions were not sampled and analyzed by CWS.

Another form of concretions, documented by Watson to lie in layers in the Winnipeg Formation, is oolite nodules containing pyrite.¹⁴ Photographs of the oolite nodules found in extracted sand piles near Vivian are given in my report of August, 2020 submitted for the public review of the Vivian Sand Processing Plant. There is no doubt that these pyritic oolite nodules documented by Watson are found in the Vivian area.

According to the hydrogeological report two of the three samples in the Red River Carbonate and one sample in the shale exceeded screening criteria for selenium. Selenium is commonly found absorbed in sulphide minerals.⁸ Oxidized selenium (selenates) are very soluble and toxic to aquatic organisms and humans.^{7,8} The concentrations of selenates in the samples are consistent with oxidation from selenium in pyrite in the samples and are consistent with the samples being compromised by oxidation by air.

The selenium in the shale in the aquifer will be exposed to re-injected aerated water. The selenium will be oxidized to form soluble selenates that will contaminate the aquifer.

The ALS reports show all three shale samples for Bru 121-1 Bru 146 and Bru 95-8 having high As (arsenic) concentrations of 20.4, 13.3, and 24.2 ppm respectively despite the air oxidation that would create acid that could leach out As. Properly protected core samples would likely show even higher concentrations of arsenic. Given that the maximum allowable concentration of As in water is 0.01 ppm, these high As concentrations along with the evidence for acid generating pyrite in the shale represents a severe risk for As contamination not only of extracted samples but more importantly of the aquifer. The re-injected aerated water would cause the formation of acid from sulphide in the shale, and sand (marcasite), sand concretions, and oolite that would mobilize the arsenic.

Proper re-sampling to protect against air exposure and oxidation is likely to reveal the presence of selenium associated with the pyrite in the samples.

Questions:

Will CWS engage an independent expert to gather core samples and sand samples from representative locations in the Bru area that will be protected against oxidation and have the samples re-analyzed? Will CWS have properly protected samples of lower shale, concretions and oolite nodules analyzed? If the re-testing demonstrates that the samples contain significant amounts of sulphide and heavy metals that will likely contaminate the aquifer when the cavities are filled with re-injected aerate water will CWS abandon their operations in the Vivian area?

6. Numerical Groundwater Model

The CWS hydrogeological study in the numerical groundwater section states;

“It was beyond the scope of this assessment to develop a water balance for the regional aquifer system in the context of existing and future groundwater use. The numerical groundwater model assesses the short-term response of the aquifer to the stresses of groundwater and sand withdrawal. Streams, lakes, regional groundwater use and groundwater levels along the boundaries of the model domain are assumed to stay constant with time.”

“Scenarios 1 and 2 assess the possible range of re-injection of groundwater after solids are removed from the production fluid (0% and 50% of slurry volume re-injected) from the sand extraction process. These scenarios that consider the reinjection of all groundwater are presented for comparative purposes only and note that the hydrogeological assessment is based on a hypothetical conservative scenario involving zero reinjection of water. CanWhite does not intend to discharge any water to ground surface. The Winnipeg Shale is inferred to be considerably weathered and assumed to degrade (increased hydraulic conductivity) in Scenarios 1 and 2 when locally disturbed/unsupported from below due to extraction of the Winnipeg Sandstone.”

Even though CWS claims that no discharge of water will occur from their processes, water will be lost from the aquifer in the 15% water retained in the sand stock piles at the processing plant as described in the EAP for the Vivian Sand Processing Plant. In addition water will be removed with the carbonate and shale drill cuttings and from the concretions that are separated out at the extraction site by vibrating screens. The volume of such waste and the entrained water in the waste is not determined in the CWS hydrogeological report. The groundwater model does not determine the sustainability of the groundwater removal from the aquifer. This should be an essential feature. A study by Kennedy and Woodbury (2005) determined by 2025 the sandstone aquifer would be beyond sustainable water use due to growth alone.¹⁶ Extra draw on the aquifer from the CWS operations are likely to be unsustainable.

Questions:

Will CWS determine the total withdrawal of water from the aquifer from all sources including water retained in the sand stockpiles and in all waste streams including waste from vibrating screens and drill cuttings at the extraction site? Will CWS determine the affect of these withdrawals on the sustainability of the sandstone aquifer?

The numerical model used for the groundwater study does not evaluate the actual operational activities of the extraction. The modelling only details with hypothetical situations where 50% and 0% of the water withdrawn from the aquifer is re-injected. These scenarios will not occur as, according to CWS, no water will be discharged by the project.

During the sand extraction as shown in figure 2-A of the hydrogeological report water is re-injected near the top of the aquifer through the exterior tube of the well pipe and sand plus water moves up the central tube further down in the aquifer at the bottom of the well pipe. At the bottom of the pipe the fluid pressure will be less than the surroundings. Where water is injected near the top of the reservoir the fluid pressure will increase from the injection.¹⁸ Water in the aquifer will flow from high fluid pressure to lower. Some of The re-injected water will circulate toward the bottom of the extraction well pipe where the fluid pressure is lower.

In the hydrogeological report it is admitted the shale layer separating the aquifers is compromised by the pumping activities and the creation of a cavity such that the shale is unsupported. The calculations in the report of February 2021 reviewed by Dr. Ingraffea demonstrate the shale will slake into the cavity created. The carbonate aquifer will be directly exposed to the sandstone. In the far-field of the carbonate aquifer the fluid pressure will be lower than at the re-injection site. Some of the re-injected water will flow into the carbonate aquifer. The carbonate aquifer has a higher transmissivity than the sandstone so water will preferentially move into the carbonate aquifer. The re-injected water will be aerated and react with sulphide in the shale aquitard, with the shale layer lower in the formation, with sand concretions and oolite nodules, and with the marcasite of the sand to form acid and release heavy metals. Selenium measured in the geochemical analysis will be oxidized to a soluble form contaminating the aquifer. Microbes that survived the ineffective UV treatment will be able to proliferate in the aerated water in the sandstone cavity. All these sources of contamination will be able to migrate in the carbonate aquifer driven by the high pressure zone for re-injection. This simultaneous reinjection of water and withdrawal of sand and water in the air lift extraction tube of the well was not modelled.

The scenario of re-injected water entering the carbonate aquifer is consistent with the complaint of brown water in a well nearby where CWS was extracting sand at Centre Line Road near Vivian MB. The brown water occurred only at the time of CWS sand extraction. This incident is documented and analyzed in the What the Frack Manitoba February 2021 report.²

The effects of CWS re-injection should be comparable to the effect of waste water injection into a limestone aquifer in Florida. Calculations for the Florida injection indicate that by mid-1974 pressure effects from waste injection extended radially more than 40 miles (64 km) from the injection site.^{18,19} The contamination induced in the aquifer from aerated re-injected water could be expected to reach the discharge of the carbonate aquifer to the Red River and Lake Winnipeg in just a few years. The contaminated discharge to hydraulically connected streams of Cook's Creek and the Brokenhead River would be much sooner. Contamination would spread north westward through the carbonate aquifer along the discharge path.

Questions:

Will CWS model the simultaneous re-injection and water plus sand removal to obtain meaningful groundwater flow results for the CWS extraction process? Will CWS model the migration of contaminants formed in the sandstone aquifer through the degraded shale aquitard and through the carbonate aquifer?

7. Mixing of aquifer waters

The hydrogeological study admits that the aquitard preventing the mixing of aquifer waters could be compromised. The What the Frack report of February 2021² peer reviewed by Dr. Ingraffea determines that the shale layer will slake into the cavity created by sand extraction. The hydrogeological study attempts to down play the consequences of mixing of aquifer waters. In the area where the flow regime will be from the carbonate to the sandstone, iron and likely hardness are expected to increase but not to a harmful extent.

A group of residents near Vivian have already filed a formal complaint with Manitoba Water about increase in iron in their well water and other detriment since CWS exploration drilling activities in the area. Obviously the residents do not accept such changes to their water. The complaints of the residents were not investigated and summarily dismissed by the Director of MB Water stating that iron has been found historically in the well water. However mixing of aquifer water, even if not harmful, is not allowed according to the Groundwater and Water Well Act regulations.¹⁷

Question:

Will CWS respect the regulations of the Groundwater and Water Well Act and terminate plans to extract sand in the Vivian area where mixing of aquifer waters cannot be avoided with the CWS extraction methods.

8. Well Seals

The EAP states that all the hundreds of wells drilled per year will be sealed according to government regulations. The hydrogeology study admits that the shale layer could be compromised by the excavation activities. Spalling of the shale into the excavation cavity would compromise seals across the shale aquitard. The limestone thickness in the eastern Bru area is below the minimum thickness to prevent subsidence as specified by the EAP according to Stantec studies that were not available. The limestone thickness over the entire Bru area is insufficient for limestone stability according to a report by Waltham and Fookes (2003)¹. Instability in the limestone will compromise all the well seals in the carbonate aquifer. Subsidence of the till into the extraction cavity in the sandstone described by the USGS will compromise the till seals.³ Massive seal failure in the hundreds of CWS wells drilled per year would result in serious aquifer contamination from surface run off carrying chemicals and microbes such as fecal coliform from septic fields and animal feces.

Question:

How will CWS prevent well seals from failing due to subsidence that has been demonstrated will assuredly occur?

9. Accidents and Malfunctions

CWS admits the possibility of slurry line failure and leakage. The EAP states;

“An accidental release of slurry or return water may also occur if a break or crack occurs in the slurry and/or water return line. Accidental releases, depending on the type and quantity of substances released, have the potential to affect air, surface water, groundwater and soils, with consequential effects on vegetation, aquatic resources and possibly human health and safety. Slurry and water return line will be inspected on a daily basis, and after extreme weather events, to check for leaks and/or breaks in the line. If leaks or breaks in the line are detected, appropriate spill containment and clean-up measures will be applied as soon as feasible and the line will be repaired or replaced.”

The slurry line and water return lines are specified to have a maximum flow rate of 24 cubic meters per minute in the EAP for the processing plant. A slurry line break would cause a massive spill far beyond the capacity of any spill containment measure. With only daily inspections a slurry line break could discharge for hours before detection. No automated leak detection and pump shut down system is specified in the EAP.

Slurry line wear due to the abrasive nature of the sand is common. An external inspection will not reveal such wear.

Literature studies on sand erosion of HDPE pipe indicate wear of the order of 20 mm per year can be expected. Curves and joints are particularly susceptible to wear.²⁰ Using the relationship that the flow rate of the line is the product of the interior area and the fluid velocity, using the 24 cubic meters per minute flow rate specified in the EAP for the processing plant, the flow rate for the main 14 inch slurry line is estimated to be 6.11 m/s. An article in the Oil Sands Magazine states;²¹

“An absolute maximum flow of 6.0 m/sec is normally tolerated, but only on a very infrequent basis. Since slurry lines are prone to sanding, guidelines for minimum slurry velocities are normally established in order to prevent sanding. A typical normal minimum is 3.0 to 3.5 m/sec.”

This evidence illustrates slurry line wear and subsequent failure is very likely.

The joints connecting smaller slurry lines to the main 14 inch slurry line may be particularly susceptible to wear.

A presentation by Dacon technologies state;²²

“Since mines started using HDPE lines for Tailings transport, erosion in the bottom of these lines have been an issue.”

For 85 mm HDPE pipe the erosion rate was about 3 mm/month and for 110 mm HDPE pipe the erosion rate was up to 11 mm month. Dacon technologies describe inline inspection and automated leak detection methods.

A paper by Burn et al. 1998 reports an annual breakage frequency of HDPE water pipe in Australia of about one per 12.5 km. Breakage rate in a slurry line would be expected to be much greater.²³

As described in a submission for the French drain alteration posted on the Manitoba EAB Public Registry 6057 on April 8, 2021, soluble contaminants such as iron, arsenic, selenium and the highly toxic acrylamide monomer will continually build up in the slurry and return water line. A spill would release these toxins to the environment. A large spill would migrate into the Brokenhead River or Cook’s Creek. Contaminants could penetrate the carbonate aquifer through permeable aggregate cover and quarry excavations. Continued use of this water for a 24 year period with the use of over winter storage tank is simply untenable. CWS does not acknowledge the need for treatment of this recycled water to remove contaminants and resupply with fresh water. No plan is made for the waste steam that would be generated.

Questions:

Will CWS install leak detection on their lines with automated pump shut down? Will CWS use interior wear inspection tools at regular intervals to determine the extent of slurry line wear? Given that contaminants will continually build up in the slurry and recycle water lines, will CWS develop and supply a recycled water treatment and associated contaminant waste generation plan?

10. The Winnipeg Aqueduct

As illustrated in figure 4 the Winnipeg aqueduct traverses the entire 24 year CWS project area. The slurry lines will eventually have to cross the aqueduct likely multiple times. The aqueduct is known to have cracks

that allow infiltration of surface water.²⁵ Slurry line spills near the aqueduct could contaminate Winnipeg's drinking water supply with arsenic, selenium, other heavy metals and the highly toxic acrylamide monomer.²⁴

Questions:

Has CWS informed the City of Winnipeg of the requirement of the slurry lines to cross the Winnipeg Aqueduct and described safeguards that will mitigate the potential for contamination of the aqueduct water? Has CWS obtained a legal agreement with the City of Winnipeg and the Government of Canada to cross the aqueduct considering that the aqueduct crosses provincial boundaries and is therefore federal in scope?

11. Section 35 Indigenous Consultations

The project will have a devastating impact on the traditional lands of indigenous peoples in the 24 year CWS project area. On average 56 well clusters per year with a diameter of 54 meters will be cleared. Slurry lines will be cleared between the clusters that are 60 meters apart. The slurry lines will be moved every 5 to 7 days requiring use and movement of vacuum trucks. The evidence presented here illustrates that large sinkholes will develop that could contaminate the aquifer with bacteria and chemicals in runoff. The sinkholes will cause a permanent destruction of traditional land and natural drainage. Large spills from the slurry and return water lines are to be expected. The spills will carry contaminants such as arsenic selenium and toxic acrylamide that will drain into nearby water courses such as the Brokenhead River destroying fish and fish habitat. The contaminants will be carried downstream.

Question:

Will CWS immediately ensure that the Crown undertake comprehensive section 35 consultations with the affected first nations and Métis?

The consultations must proceed before licensing is complete.

12. Noise

The EAP states;

“Noise generated by Project activities (e.g. extraction well drilling; operation of vehicles and machinery such as pumping stations) has the potential to adversely affect wildlife (Section 6.5.2) and could result in nuisance noise to people living within the Local Project Area. Project components expected to generate noise that may contribute to noise levels at the nearest points of reception (e.g. nearest residence, i.e. 133 m from a well cluster area) are listed in Section 2.8. Example noise sources associated with Project activities include mobilization of extraction well drilling equipment, drilling of wells and operation of pump stations. The following measures will be implemented to reduce noise generated from Project activities: • Vegetation clearing will be minimized to the extent feasible. • Project activities will setback a minimum of 100 m from nearest residences. • Mobile equipment and vehicles will be kept well maintained and will be fitted with mufflers, and other noise mitigation equipment as required. • Unnecessary idling and revving of engines will be avoided. • Additional noise mitigation measures will be applied (e.g. portable noise barriers) as required. In consideration of the above measures to minimize noise levels due to Project activities, it is anticipated that potential noise levels at the nearest residences will be adequately attenuated. Noise disturbances to wildlife are expected to be moderate in the vicinity of Project activities but are not expected to measurably affect wildlife populations within the Interlake Plain Ecoregion within which the Project is located.”

The EAP does mention compressor noise. The mitigation measures such as portable noise barriers are not adequately explained. No actual noise measurements have been made and reported.

Currently as of Aug.18, 2021 CWS drilling and sand extraction activities are occurring in a quarry site south and west of Vivian as shown in figure 5. The local residents have been complaining of excessive noise. The sand piles are uncovered. Local residents have noticed dust blowing from the sand piles. Drillers and quarry workers and nearby public are likely exposed to silica dust.

Question:

Will CWS record and report noise levels of such quarry operations and take adequate measures to avoid exposure to silica dust in such operations?



Figure 5. CWS sand extraction activities in a quarry site near Vivian MB Aug. 18, 2021

13. CWS Vivian Railway Yard

The CWS Extraction EAP states;

“The sand Processing Facility and associated infrastructure, including the rail loop and interconnection with the existing Canadian National Railway, are being reviewed by Manitoba Conservation and Climate (MBCC) as a separate project requiring a separate Environment Act Licence to proceed. Therefore, the Processing Facility and associated infrastructure components are not assessed within this Environment Act Proposal.”

The CWS railway loop, railway yard and load out facilities are intimately connected to the Project and will have cumulative effects such as noise, vibration and drainage that will interact with the Processing Plant and extraction noise vibration and drainage. In order to properly account for cumulative effects the projects must be assessed together.

We are not aware of a separate licence process for the CWS railway yard and CN railway spur line connection.

Questions:

Will CWS explain the timeline for the CWS Vivian railway licensing process and the necessary technical and public review process?

Will the CWS Vivian railway yard and loop and the CN spur line require a certificate of fitness and approval by the CTA? Will CWS follow the CTA guidelines for approval to construct a railway line including the following;²⁶

“Before you submit your line construction application, you are expected to engage the people in the localities (communities and others as described in the Key terms below) that would be affected by the proposed line. You should use this engagement process to:

- *discuss the proposed railway line and understand what impacts its construction and operation would have, whether negative or positive; and*
- *identify appropriate measures for addressing localities' concerns.*

You are expected to engage the Indigenous groups and peoples your proposed line could affect. Their views and concerns are part of the interests of the localities that the CTA will consider when assessing the application. Be sure to document all engagement results and include this documentation in your application

Once you have identified relevant localities, including any Indigenous peoples, you are expected to discuss the proposed railway line with the appropriate municipalities and other government bodies. The purpose of these discussions is to help you identify:

You should use a variety of methods to promote your engagement activities to a broad range of stakeholders within the localities. For example, you could:

- *request that the municipalities post a public notice on their websites;*
- *broadcast a notice with local radio stations;*
- *place a notice in local newspapers;*
- *place a notice of the planned information sessions on the bulletin boards of public buildings, community halls, social organizations and service clubs;*
- *advertise the information sessions within the newsletters and websites of local associations and service clubs;*
- *use various social media platforms such as Twitter, Facebook or other internet sites or mobile applications;*
- *include information in material distributed by municipal counsellors to their constituents; and/or*
- *directly contact persons who will be affected (for example, by hand-delivering notices to relevant businesses and residences).*

Include maps and plans that are made to scale, labelled, include a north arrow, and have a comprehensive legend that defines the symbols used.

- *Maps should depict the location of the proposed railway line and associated infrastructure in relation to their geographic surroundings.*
- *Plans should capture all of the geometric features of the proposed railway line and other important railway line components and be prepared and dated by a qualified engineer.”*

15. Traffic

Questions:

Will CWS specify the size and number of trucks per day required to transport the screened out waste such as concretions and the drill cuttings from the extraction area to the licensed disposal site? Will CWS identify the licensed disposal site?

16. Licensing

The CWS Extraction EAP states,

“CanWhite is currently applying for an Environment Act Licence for extraction activities up to and including 2025 because advancements in extraction methods and operations are expected to increase efficiency and reduce overall footprint after 2025. This will be explained in subsequent Notices of Alteration for the future potential extraction years, with the information and review process for Notices of Alteration of an Environment Act Licence for the Project being as required under Section 14 of The Environment Act. Therefore, the scope of this Environment Act Proposal is limited to the proposed activities and Project spatial extent up to and including 2025.”

Any project alterations such as slurry line crossing of the Winnipeg Aqueduct after 2025 could be considered as minor alterations and thus avoid public and TAC technical review.

Question:

Will CWS in the interest of transparency and proper independent technical review of any future Project alterations apply for a license for the full period of 24 years and include all anticipated future alterations in the current EAP?

17. Missing reports

The following reports that are not yet produced provide critical information required for the approval process. The mine closure plan is especially important and under the Manitoba Mines and Minerals Act should have been filed by CWS before the commencement of advanced exploration activities.

Waste Characterization and Management Plan
Water Management Plan
Progressive Well Abandonment Plan
Erosion and Sediment Control Plan
Groundwater Monitoring and Impact Mitigation Plan
Mine Closure Plan
Re-vegetation Monitoring Plan
Emergency Response Plan
Heritage Resources Protection Plan
Stantec Reports

Question:

Will CWS produce the above follow up plans as part of the EAP?

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