

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

JMA AIMOLA

Robyn Ingram

Maureen Yakubicka

Evan Robert

Erika MacPherson

Justine Hudson

Anne Wowchuk

Claude St-Jacques

Mark Wowchuk

Alison Weiss

Roxanne Frechette

Deborah Thompson

Diana Newbury

Janice Brolly

C. Hugh Arklie

Hello, my name is Joshua Aimola. I am a home owner in Ste Rita, MB, approximately 12 kilometers East of the proposed CanWhite Silica Sand mining site.

I rely on a private well on my property for potable water. My well is dug in 96 feet underground.

Will my well be at risk of contamination during operations?

Will my well "dry-up" during operations?

If you cannot provide answers to these queries, I am happy to follow up or pursue any information you could provide so that I can access all the pertinent information related to my questions.

Thank you very much,

JMA AIMOLA

I would like to express my concerns on the CanWhite Sands project near Vivian, MB.

It will no doubt have negative impacts to the well water in the area, and the deforestation, displacement of wildlife and food sources destroyed. It has terrible environmental impacts and negative impacts on human health. This is rural town, everyone living in this area chose to live here due to the country setting. We all pay a lot of money to buy these homes, and we pay a lot in property taxes to live out here, and no one wants this. This is destroying the nature that surrounds us, and whoever approved did NOT get the support from anyone living in the area. This is a terrible decision and someone needs to stop it from happening.

Robyn Ingram

Hi

As I follow this "project" I need to address the damage that is happening/going to be happening to the town of Vivian (and surrounding areas) is unacceptable! The wildlife, the land, residents/tax payers in the town/surrounding communities do not deserve to have this disruption to the town. This is a terrible area for this "project"! CanWhite can find a more unpopulated area for it's destruction and pollution to our beautiful valued and much needed land! This must STOP!

I live in the town of Anola and I am concerned with the impact this will be causing. I am concerned for my health absolutely and the protection of the environment!! I've heard nothing but negative impact from what's occurred already!! We are already going through global warming lets not add to more loss of trees and destruction, not to

mention loss of important and needed wildlife and its habitat. When and where does it end If this kind of destruction keeps getting the "ok"!!

When CanWhite cleared land for their proposed industrial processing plant and rail yard south of Vivian, much of the wildlife was displaced and food sources destroyed resulting in an increase to wildlife encounters in town. CanWhite cleared this land under the premise that they were a mere private land owner and had the right to do so. SHADDDY MOVE!!! Absolutely NO respect for the residents in town and wildlife! Not a company that's very trustworthy nor does it care period! Only cares about its own financial growth! UNNACCEPTABLE! Who will then care for us citizens once the health issues, water table loss and contamination occur which we all know is and will be occurring!! Where will i get fresh water for my family once my water source is polluted and destroyed!! Who's got our backs if this all goes through!

We the citizens residing in this area call for a Clean Environment Commission public hearing with intervenor funding and that CanWhite Sands Corp, must develop a full Environment Impact Statement (EIS) and What the Frack MB, Brokenhead Ojibway Nation and Our line in the Sand MB participate in the development of parameters for the EIS.

Protect our Land/Water is a must!

Thanks for your time
Maureen Y.

Morning,

The CanWhite sands project is fracking. With all the mounting evidence on the negative environmental impacts of fracking, why the CanWhite sands is being pushed through with little consideration for the environment is beyond me.

I'm concerned that our local government does not have the interests of its constituents in mind. I'm concerned that people are getting their pockets lined at the expense of our environment and our access to fresh, clean drinking water.

It's evident that access to fresh water will very quickly become a concern of ours in the future. Why are we not protecting this invaluable resource in every way we can? Why are we allowing a company from another province to spoil our land? Who is gaining from this endeavour? Do we, the people, have something to gain?

We don't need new jobs if the jobs are at the expense of the natural environment. We have one land, and we need to honour it. For our future, for our children's future, and for everyone to come after us.

Please call for a Clean Environment Commission public hearing with intervenor funding.

Please require CanWhite Sands Corp to develop a full Environment Impact Statement.

Please make it mandatory for CanWhite Sands Corp to work closely with What the Frack MB, Brokenhead Ojibway Nation and Our Line in the Sand MB in the development of the parameters for the Environmental Impact Statement.

Make this statement public. Release it to local and Winnipeg news networks. There is not enough attention in this.

Please ensure we do everything we can to protect the land, which should have a higher priority than any potential financial gain.

Thanks,
Evan

To whom it may concern,
I've recently learned about the CanWhite Vivian Silica Sand project and read the report by Dennis LeNeve and the CanWhite EAP. I share the concerns of many that the groundwater and waterways in southeastern Manitoba are vulnerable to contamination and overuse by this unconventional mining method. This is not a positive investment in our neighbourhood.

I am registering my opposition to CanWhite receiving Environmental Act Licences from the Province of Manitoba.

Thank you,

Erika MacPherson
Hadashville

Hello,

As a resident of Anola, I am concerned about the CanWhite silica sand development project proposed in the RM of Springfield. This project has the potential to contaminate the potable water in the southeastern Manitoba aquifer that many Manitobans rely on as their sole source of drinking water.

Not only does this project threaten the quality of our drinking water, but it also threatens the integrity of the aquifer itself. There is no amount of money that is worth risking our drinking water and this should be evidently clear after one of the driest summers in Manitoba's history.

I am appealing to you under Section 27(1) of the Manitoba Environment Act., to overturn the Manitoba Director of Environment Approval recommendation to you to not

convene an independent public panel review process of the CanWhite Sands proposed development project file #6057.00.

I also request that you suspend the current Manitoba environmental review process and request that CanWhite Sand Corp. submit a full Environmental Impact Statement (EIS) that not only includes the new hydrogeological study, as promised by CanWhite Sands but also the third-party technical information and data on its unconventional mining method, to be reviewed as a Class 3 Development project as per the Manitoba Environment Act., by an independent public panel review process.

Finally, I request that you immediately undertake your government's legal requirement to do Section 35 Consultation with the affected First Nations and Metis Peoples with respect to the proposed CanWhite Sands development project.

Sincerely,
Justine Hudson

To Whom It May Concern:

I am writing as a concerned resident of the Rural Municipality of Springfield, near the proposed CanWhite Sands extraction project near Vivian. I did participate in the Virtual Open House and was disappointed it was not conducted in another manner – town hall setting or in-person setting. I was also disappointed that CanWhite, once again, did not answer all of my questions submitted prior. Here is the following questions that I submitted:

1. There is a map on the page 26 that shows private and Crown land. There is more private land in the area than what you have indicated. Please address as to why this is an incomplete map?
2. You mention in your proposal that traffic will be within the Project Site along the PR 302 (Ostenfeld Road) for up to 5 km or along municipal road. Five kms is approximately at Road 57N or Centre Line Road. Your project site is east of Highway 302. No municipal roads lead east between Highway 15 and to Centre Line Road. How are you going to access the site? Obviously, you must be planning to build a road to the site – where is that going to be?
3. How are you going to transfer the slurry from Queens Valley Road to the site south of Vivian?
4. Friesen Drillers stated in “The Clipper Weekly” in the issue August 10, 2021 concerns about mixing of the aquifers and “criticized the methods used to assess possible domestic impact on nearby private wells”. Without stating that Friesen Drillers is wrong, can you please provide scientific evidence describing how water will not seep through between the two aquifers and how local wells will not be affected? During the drought this year, many residents in the area have had “dry spells” in their wells. Extracting the amount of water for your production that you are proposing, is concerning as to whether those wells will “dry up” – either temporary or permanently.

Questions one and two were not answered; question three was addressed by CanWhite stating that there were going to have the slurry line run underneath the existing Highway 302 but did not provide any further details. Would they not need to apply for permits from the provincial government? Would traffic be disrupted? What type of pipe would be utilized? In regards to question 4, Mr. Bullen stated that they will monitor the area and pre-assess the immediate area. If private wells fail, they will bring in potable water, assess and determine if they are at fault and will determine the best course of action – drilling a new well or deeper well. Mr. Bullen commented on our well complaint and stated that it was not CanWhite's activity that caused the situation and there were pre-existing problems. The pre-existing problems that we had was in 2007. The problem was not involving our intake well but our "dump well" from our geothermal heating and cooling system. CanWhite did not test or assess our well, they only had Friesen Drillers, Jeff Bell call me and discuss the issue. It is believed that Friesen Drillers were on contract with CanWhite so I do not believe that they were impartial. During the open house, Mr. Bullen discussed the uses of silica sand. He did not state specifically which industry this sand would be delivered to as it is my understanding, different industries require specific composition of silica sand. Mr. Bullen appeared to be in a "blaming" others as opposed to providing the residents with credible information. Further to the virtual open house concerns, the following are my concerns regarding the general operation and from what I gathered directly in the proposal:

1. CanWhite mentioned that they will move the slurry from the drilling site to the processing site via directional drilling and through a pipe. Several wells will be drilled in an area and then equipment moved. How will they replace the sand that was removed to prevent earth movement and ground sinking? The ground will shift to some extent although CanWhite is disregarding this possibility. When one drills into the ground (fencing, house, piles etc.) the ground will shift. My concern is the impact on drilling and directional drilling that CanWhite is suggesting. It may not occur in a short term but the ground may be affected in ten or twenty years. What are the companies' plan to prevent any breakage or malfunction in the slurry lines? What is the clean up procedure for a sand spill, if one is to occur?
2. CanWhite is stating that the amount of ground water that is being temporary removed, the aquifer will recover 80% within two days and the remaining within eighty days. This may not be significant to CanWhite but it will be significant to those with shallow wells in the area. This calculation was applied, I am assuming, to an ideal water and/or soil moisture level. What is the impact during a drought as we are experiencing? Our well and neighbouring wells have temporarily dried up this past summer. Our well was able to recover over a very short time and we began to conserve water to prevent this from occurring again. I would suggest that if the drought conditions replicates itself, that CanWhite would need to suspend its operations to conserve water consumption to prevent wells from temporary drying up in the area.
3. Again, I would like to raise my concern about traffic and access to the temporary drilling locations and the permanent processing site. It is still very vague. If they are utilizing temporary roads (trails) then are they allowed to access hydro line right-of-way for this purpose? I would suspect that Manitoba Hydro will need to be consulted and this temporary access along the hydro line is also used by snow machine organizations for

recreation. I do not see in the documentation any consultation was conducted. I am also aware, as I reside in the area, that it is also utilized by hunters. There is no indication of any permanent road to the processing site. In my opinion, this questions the credibility of commitment to the project as well as the community. Many times, CanWhite discusses good neighbours and being apart of the community. If this was in fact true, they would be providing further documentation on permanent roadways in the area.

4. In the proposal they discuss noise. I would strongly suggest that operating a facility and construction of the proposed facility 24/7 would be in contravention of the Noise by-law of the municipality. When they were operating at a test location on Centre Line Road where we live just about one and a half miles away, I could hear the equipment operating throughout the night. I have attached a link to the Noise By-law of the municipality for your reference:
<https://www.rmofspringfield.ca/Home/DownloadDocument?docId=74b2170f-02b3-4a07-82e6-72e7ead2bf74>
5. CanWhite discussing about constructing drainage ditches. I am concerned that contaminated water will be drained into these drainage ditches and subsequently drain into the provincial waterway systems. The water is described as “runoff” and in my previous documentation on their previous proposal, I attached photographs as to the amount of water being allowed to “runoff” and create overland flooding in the area.
6. I would like to reiterate the maps submitted in the proposal do not show all the private land. This omission questions the sincerity and credibility of the company.
7. I have observed that the project dates are constantly changing. CanWhite is very ambitious and unrealistic in regards with their timeline of commencing operation. It would appear this is for the investors’ sake and not for the residents of the communities.
8. In section 2.2.3 of their proposal they discuss “These ‘overs’ that are captured will be temporarily stockpiles in a containment tank on site before being removed off site for disposal at a licenced facility”. Where is this licenced facility? What licenced facility are they referring to? And how will it be transported to the licenced facility?
9. In part two of their proposal, they discuss dust control and using water for the gravel roads. Water is not effective and would question why they would not utilized other substances like calcium chlorate and magnesium chloride that are commonly used for this purpose.
10. CanWhite has recently cleared trees on the land that they hope to build the processing facility. They comment in this proposal that they will restore the terrestrial environment after the completion of the operation. If their proposal is not approved by the provincial government, what is their plan to restore what they have already damaged? Would they be obligated to restore the environment that they have already damaged?

11. It is common knowledge that the Indigenous population utilized this area for sage harvesting. Indigenous persons from Manitoba and Ontario travel to this area to harvest sage. I do not see any documentation that Indigenous persons from Ontario have been consulted. I have conversed with the Indigenous people who were harvesting the sage from Ontario and they were not aware that this facility and operation was being considered.

I oppose this extraction process operation. I have outlined my concerns pertaining to the affect this proposal has on the water including the aquifer (the quality of the water, contaminants being introduced and the water level and how these concerns affect my drinking water) and drainage; the transportation of the slurry, "overs" construction and heavy equipment and the employees; affects underground and the sinking or settling of the earth; noise; dust; restoration compliance; proper consulting with Indigenous groups; employment for Manitoban residents and the general credibility and commitment of CanWhite. I would ask the public registry to re-consider this proposal.

Sincerely,
Anne Wowchuk

To whom it may concern:

I am writing to ask that this project proposed by CanWhite Sands be completely rejected. This project would involve direct intrusions into the aquifer which supplies high quality potable water to towns, villages and rural residents of a large area of South-eastern Manitoba. This project would impact the aquifer by blasting the water-bearing sand formation with high pressure compressed air, with subsequent pumping out of the sand-water slurry and the return of aerated water to the aquifer. This is messy, and as a matter of principle, no one should be allowed to mess with the water supply of our population.

Yes, it is a matter of principle: can you imagine or visualize the uproar that would result from a proposal by say, the Shoal Lake First Nation, to develop a mine on their land, near the inlet of the Greater Winnipeg water aqueduct at Shoal Lake? Even if their proposal were not for a mine, but just say for a surface stone quarry? Speaking of stone quarries, you will recall that in 2007 a U.S. company had proposed the development of a stone quarry at Whites Point near Digby Nova Scotia, the proposal was rejected on the basis, among other considerations, that it could adversely impact the local aquifer. The company sued Canada under the old NAFTA for 443 million dollars. In the end Canada was given a fine of 7 million dollars, but our environment was protected.

I acknowledge that silica sand is a product essential to sustain our modern technology, but surely there must be other deposits that could be mined without messing with people's drinking water. We have professionals in our public service with vast knowledge about our geology, they should be able to point CanWhite into another

direction? For example, back in the 1950's, I worked for a few years for Sherritt-Gordon Mines in Lynn Lake, my shift boss in the surface crusher developed in his lungs a condition called silicosis, he eventually died from it in the Clear Water Lake Sanitorium near The Pas. Therefor I would assume that there had to be silica in and around that mine in Lynn Lake. I also remember that there were very large sand eskers here and there on the landscape up there, could some of these contain silica sand? Regardless, the main point I guess is this: please do not allow them to blast their way into our pristine aquafer.

Yours truly,
Claude St-Jacques,

To Whom It May Concern:

My name is Mark Wowchuk. I am a former employee of CanWhite Sands and held the position of Operations Manager in Manitoba [REDACTED]. I was the only full-time Manitoban resident that they had employed. I reported to [REDACTED]. I reside near their proposed extraction site. I am an industrial mechanic and have held supervisor and senior management positions with variety of companies [REDACTED]

[REDACTED] prior to being employed with CanWhite. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] I question the numbers that CanWhite states as far as employing local people. Will they be Manitobans or people from Alberta? In these economic

times where Manitoba is attempting to recover the economy from the Covid-19 pandemic, hiring locally would be a strong benefit to some families.

[REDACTED]

[REDACTED] I question the sustainability of CanWhite being apart of the community of the Rural Municipality of Springfield.

[REDACTED]

[REDACTED]

[REDACTED] From the literature that I have seen, I do not see any scientific validation to their unproven methodology, especially given the tonnage that CanWhite is expecting to extract . If a method is unsuccessful and proven so, why would the government allow a company to proceed with the chance of contaminated the aquifer and other local water supplies?

[REDACTED]

[REDACTED] If overland flooding is to occur, I do not see what plan CanWhite has to mitigate this situation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. I am unclear as to where they are going to access the site from Highway 302 like they stated they were going to do. I am concerned about the construction traffic and the damage that they larger vehicles and equipment can have on the roadway. There are no access roads heading east along Highway 302 to provide accessibility. Therefore, they will have to construct a road that will be able to handle the weight of the vehicles and equipment.

I oppose this extraction process because it is not a proven process

[REDACTED]

I would ask the public registry to re-consider their proposal.

Sincerely,

Mark Wowchuk

Dear Ms. Winsor, P.Eng.,

It has come to the City of Winnipeg's (City's) attention that CanWhite Sands Corp. (CanWhite) has submitted an Environment Act Proposal for the Vivian Sand Extraction Project (Public Registry File No. 6119.00) for silica sand extraction activities within the Rural Municipality of Springfield. The Environment Act Proposal includes extraction sites up to and including the year 2025.

The City's sole drinking water source is Shoal Lake. Water is conveyed from Shoal Lake to the City in a single concrete aqueduct called the Shoal Lake Aqueduct. The Greater Winnipeg Water District Railway is a City owned and operated rail line that services the Shoal Lake Aqueduct along its length from Winnipeg to Shoal Lake.

Based on the separation distance of approximately 4km between the extraction sites and the City's water supply infrastructure, the City does not have concerns with the currently proposed Vivian Sand Extraction Project. However, as the extraction area included in the 24-year life of the Vivian Sand Extraction Project is adjacent to the Shoal Lake Aqueduct and Greater Winnipeg Water District Railway, the City's water supply infrastructure may be impacted by expansion(s) of the Vivian Sand Extraction Project.

Any activities associated with the Vivian Sand Extraction Project that may affect the City's water supply infrastructure should be carefully planned and undertaken in consultation with the City to ensure the water supply infrastructure is protected and there are no impacts to the delivery of water to the citizens of Winnipeg. As such, the City requests that CanWhite consider the Shoal Lake Aqueduct and Greater Winnipeg Water District Railway and consult with the City in the planning stages of future expansion(s) of the Vivian Sand Extraction Project, as applicable.

Sincerely,

Alison Weiss, P.Eng.

Senior Project Engineer
City of Winnipeg

I am writing to express my concern that the proposed silica sand drilling by CanWhite may proceed without proper consultation and environmental approvals.

CanWhite has not supplied any Follow-up Plans for its licensing review process which could lead to unaccountable future renewals.

Disturbance in the drilling does not account for potential subsidence, or destabilization to municipal, provincial and federal infrastructure, transmission lines or the Winnipeg aqueduct which could suffer potential shut down from structure failure or microbial contamination, untested toxic levels of acrylamide monomer as potential emergency situations. Or community wide illness and/or death from fecal or other microbial contamination introduced from ineffective UV sterilization of injected used mine water. Or well or slurry line failures. These are examples of un-addressed issues not written into the proposals.

Also, with regard to a "Closure Plan" which would detail mitigation and monitoring activities, closure cost and financial assurances however this plan "will be developed for review and approval by Manitoba Conservation and Climate, as requested, under the Project licensing process." The Project is currently under a review for project licensing, so where is the Mine Closure and Financial Assurance Plan? This plan is intended to be "living documents...updated periodically, as needed...available on site as reference documents for Project staff and contractors". These changes or alterations will be contained in-house without need to alert regulatory agencies or apply for a Notice of Alteration. Exactly what are the terms that CanWhite has deemed "as needed"? If the Environment Approvals Branch approves the Project, the "living document" specification must be eliminated from the License.

CanWhite/AECOM has a duty to fully assess the risks and provide the review process with detailed and completed Plans addressing potential risk. An independent public panel review

process ought to be established to review CWS silica sand mine, its unconventional mining method and the legally required mine closures plan.

The government of Manitoba must hold off on issuing an Environmental Licence for CWS silica sand processing facility, until such a time that an independent Public Panel Review Process approves everything the miners intend now and in the future.

Will sink holes result from the extraction of material? Will contamination result from this unconventional extraction method employed by CWS, (by sucking the silica sand up from far beneath the ground) with deleterious substances?

This is about my drinking water, amongst many thousands of my neighbours.

Roxanne Frechette

Ste. Geneviève, MB
Municipality of Taché

Regarding the Silica Sands Extraction Project. File6119.00

As a long time resident of the RM of Springfield, I am opposed to this project put forward by the Can White Sands Corp. With the growing concern for maintaining and safeguarding drinking water, I am astounded that this project is being considered. There are over 15, 000 residents in the RM of Springfield, and nearly 80% of Canadian rural residents rely solely on safe water drawn from wells that tap into this aquifer. (information on this statistic provided by watergovernance.sites.olt.ubc.ca/files/2010/04/FS_Groundwater_Regs.pdf)

If within the first 4 years they plan on drilling 2000 wells, then, within the following 20 years an additional 10,000 wells, how do you maintain the safety and integrity of the wells, of the water, of the environment? Far too much can go wrong. Who will monitor every single well? It is also prohibited by law to mix the water between the 2 separated layers of water, which will have an easier way of mixing once the wells are drilled through both layers. And with so many wells drilled, there is a much higher chance of that happening. Drawing that huge amount of water from the aquifer, how can one facility manage to properly de-contaminate the water before re-injecting it back to the source? They had mentioned the use of UV light, but it has to be the proper strength and duration to have any effect. Also, if the slurry is exposed to the air, fungal spores that contaminate the water need a UV duration of between 24 and 48 hours to destroy the spores.

Who will inspect them? Would there be any inspections and quality control? In one of the pamphlets they sent out in the mail, it was mentioned that the "iron" taste in the water would be remedied with the aeration process. Last time I checked, when water, air and oxygen mix, rust forms.

This aquifer is our only source of water. You can't drink sand, you can't raise livestock on sand, you can't water fruits and vegetables with sand. Can Whites' plan/proposal leaves far too many gaps that don't address the short and long term consequences of

this type of risky mining. The proposal for the processing plant should be combined with the mining/extraction proposal then be reviewed by the clean Environment Commission.

Sincerely,
Deborah Thompson

Hello,

My name is Diana Newbury, I live in Lorette Manitoba and I use well water on my property. I feel that this silica extraction project will irreparably damage the aquifer that I and my neighbours rely on for clean drinking water. Even if we were not in unprecedented drought conditions, I feel that removal of the sand and water will have a very high potential to cause salinization of the aquifer, and result in the potential introduction of contaminants to the aquifer. With the drought conditions, I see this as an even higher likelihood. I would like to publicly register my concerns about this project as I believe that the drinking water supply of so many Manitobans is vitally important and this project puts that drinking water at risk.

Thank you for your time,

Diana Newbury

Hello

What can I say on this subject that you haven't already read from others?

I have been following this project for more than a year!

I have read the numerous news articles and the reports by experts (such as Dennis LeNeveu's 47 page report), as well as Friesen Drillers review of the submission who, in regards to the claim of no mixing of the aquifers, stated that "It is our opinion that interconnection will result from this project in some way, shape or form..."

I am also aware that there are a few Rural Municipalities that are so concerned that they are privately funding an impact study.

There seems to be no question that there are risks: 1) to our water supply, 2) land subsidence, 3) toxic runoff.

As a person dependent on my own private well, this is a scary situation, and reading recent articles such as "Enbridge fined by Minnesota over Aquifer Breach" just shows how things can go wrong.

I have read the EPA. There is a lot of missing and misleading information and a complete lack of procedures for response, reporting, investigation and mitigation. There is also a lot of missing

information regarding processing and transferring “other sand” and “agricultural products”. There is just too many unanswered questions!

What is further disturbing is the “Plans” are intended to be “living documents...updated periodically, as needed...available on site as reference documents for Project staff and contractors”. These changes or alterations will be contained in-house without need to alert regulatory agencies or apply for a Notice of Alteration? Exactly what are the terms that CanWhite has deemed “as needed”?

...and this unconventional mining method is to be done by a company that has no history of any involvement with any silica sand projects (or any projects other than this one) and whose Board members have no practical experience in the silica sand mining industry?

I believe we need the highest level of assessment provided under the Manitoba Environment Act and request a Clean Environment Commission public hearing with intervenor funding since the contamination of our water will leave us without the basic necessity of life.

Please, we do not need another Walkerton tragedy.

Kindest Regards
Janice Brolly

September 27, 2021

Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century Street
Winnipeg MB R3H 0W4

Dear EAB:

Re: CanWhite Sands Corp., Silica Sand Extraction Project- File 6119.00

My response to File 6119.00, as a resident of the RM of Springfield, as a volunteer member of "Our Line in the Sand" and as a Canadian who has sadly witnessed the horrific exploitation of our priceless natural heritage, follows.

Statement of Qualifications and Limitations

AECOM has published a volume which reminds me of high school term papers. Throw as much against the wall as possible. It looks like you have been thorough and some stuff will probably stick. This technique, sadly common in Environmental Act Proposals (EAP) in Manitoba, needlessly overwhelms would-be-respondents and deflects attention from the issues important to residents of Springfield: physical health (contaminated drinking water), mental health (shortage of drinking water) and reduced property values (unreliable drinking water).

But AECOM, despite aggressive writing, offers timidity in its "Statement of Qualifications and Limitations". I quote:

- The report "has been prepared by AECOM...for the benefit of " CWS.
- The report "may be based on information provided to AECOM which has not been independently verified".
- The report "may be based on limited testing".
- The report "may be based on the assumption that such conditions are uniform and not variable either geographically or over time."

Environment Act Proposal

Like the disclaimer described above, the EAP makes claims and promises that are misleading and unenforceable.

The "proposed sand extraction activities using a method similar to standard water well drilling" is grossly misleading. To compare the CWS process to a residential well is nonsense. On April 11, 2019 the *Winnipeg Free Press* quoted Trevor Martens of Evolve Surface Strategies, a company engaged by CWS, as declaring that **he was not aware of underground sand mines anywhere in the world. Mr. Martens said "This has never been done before."**

The CWS description of the commercial use of the silica sand carefully omits the fact that the company's CEO, Feisal Somji of Calgary, attended an event promoted by Noble Capital in Florida in 2019 where he clearly stated that the silica sand will be used for fracking oil wells in Alberta and the US. There is no mention of this in the EAP.

The "Key activities and components of the Project" are nightmarish. This is nothing more than a high school-like experiment, except there are consequences. Does anyone really believe that there will be no mistakes, no carelessness, no cover-ups and no technical failures?

Unquestionably, this is about money and profit for a private corporation (i.e., not listed on any stock exchange anywhere) and its anonymous investors.

"Extraction well drilling [will be done] year-round". Sand extraction may also be done in the "winter, weather dependent". In 2014, southern Manitoba endured a brutal winter. The frost went far deeper than normal. Our well at 67085 Spruce Road in Springfield failed that winter because the joints in the well casing were separated by the frost. We were oblivious to this until the spring thaw when sand, delivered by our pump, plugged our plumbing causing a \$2,500 repair. The system took over a year to fully recover. The scale of drilling and extraction proposed by CWS is, to the say the least, imprudent. It will guarantee failures of wells, pipelines and UV treatment. It is unavoidable, particularly considering the gross scope of the project and the predictable failure of Manitoba Conservation and Climate (MCC) to police the terms of whatever license it will approve.

I have zero confidence that CWS will efficiently seal decommissioned wells. It is initially proposing an average of 392 wells per year, mostly on private property. In 2000, in Walkerton, Ontario, the contamination of a **SINGLE** well near private fields fertilized with cattle manure killed 6 people and sickened over 2,000 others. Under no circumstances can an Environmental Act License (EAL), issued to CWS, ensure that the same thing will not happen in the RM of Springfield, or anywhere else in the 1,200 square miles (*Winnipeg Free Press*, April 11, 2019) controlled by CWS thanks to the complicit Mines Branch.

CWS promises "Progressive annual rehabilitation" of the various trails and other footprints that it will impose on our landscape. This is not going to happen because it will be neither a priority, nor will MCC leave its bunker in Winnipeg to check.

Given the drought cycle that we have endured in the last 3 years, CWS, via AECOM, cannot deliver on the promise that "At no time will dry silica sand be left exposed". It was hard enough keeping my garden watered this year. How will CWS cope with mountains of silica? The answer, as they say, is "blowin' in the wind"! Again, MCC will rarely, if ever, visit.

"CWS is currently applying for an *Environment Act* license 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 is merely conjecture and will simply allow CWS to get its foot in the door such that anything that happens after 2025, good or bad, will be given MCC's Good Housekeeping Seal of Approval. It is unavoidable.

It is tedious to read AECOM's litany of dismissive comments describing impacts on geology, topography, soils, groundwater, air-quality, noise, surface water, vegetation, wildlife, traffic and aesthetics as variously "minor", "reversible" and "negligible". These gratuitous comments are stated many times while addressing several components of a full-blown industrial complex.

This, by the way, is common language when corporations seek to profit from our resources. MCC embraces this obfuscation.

Such nonsense is particularly egregious with respect to groundwater. AECOM describes significant impacts based on testing results and then proceeds to diminish them. It also repeats fallacies to which I must respond a second time: well casings are not fail-safe as I discovered to my dismay in 2014. Again, I have zero confidence that CWS will effectively seal decommissioned wells. Why would a corporation care after the ground has yielded the profit? See above reference to death at Walkerton, Ontario.

AECOM writes that "Effects on groundwater quality will be minor and, in some cases, positive." Seriously? "Discuss among yourselves", as the teacher said in high school.

Comments on air quality are, once again, repetitious causing me to repeat: CWS will not be capable of keeping mountains of silica dry under the prairie sun, and in the face of the non-stop prairie wind. It will not happen. "Therefore, the risk of silica sand dust dispersal is [most definitely NOT] eliminated."

Other comments on air quality are embarrassingly juvenile: minimizing idling is not measurable, applying water on gravel roads is ephemeral and properly maintaining vehicles is loose talk. The facts are that this mega-operation will use internal combustion engines 24 hours per day, 7 days per week all year long with the possible exceptions of Christmas and New Year's, but maybe not. Don't tell me that damage to air quality will be "minor to negligible."

AECOM's report on greenhouse gasses is sparse and unintelligible. Clearly, it was drafted to minimize any perception that greenhouse gas production will be more than negligible. Yes, it will! Year round industrial mining to feed a year round processing plant that ships product using 6,000 horsepower locomotives is most certainly not negligible. Dividing the EAP into 2 components does not change that. Give us the statistics in the form of "new, internal combustion SUVs added to our traffic".

"Noise" is another determinant of environmental pollution where hired consultants retreat to time honoured refuges such as vegetation, setbacks, mufflers and unnecessary idling. Vegetation produces almost zero noise mitigation at the distances contemplated by CWS. If vegetation deadened sound you would not hear the birds and squirrels in a forest. A minimum setback of 100 metres is a joke. My house is 100 metres from the road and I can hear every car that passes. Fitting your trucks with mufflers is the law. Don't take any proactive credit for it. "Unnecessary idling and revving" is a good example of my earlier comment regarding throwing stuff at a wall on a high school term paper. Portable noise barriers will not be used, but let me know if they are and how much they have reduced the decibel level at the neighbour 100

metres away. No, noise will not be "adequately attenuated" because that is impossible in a non-stop industrial complex.

AECOM's comments on Fish and Fish Habitat are inadequate and cast doubt on AECOM's technical skills. The Sept./Oct.2019 edition of *American Scientist* published a paper on fauna in aquifers. I quote:

"Most of the stygobionts are invertebrates and most of the invertebrates are crustaceans... although flatworms and snails contribute to the diversity of some aquifers. Among vertebrates, only fish and salamanders have successfully colonized subterranean aquifer habitats; they are found typically in highly porous and permeable karstic aquifers (those formed from the dissolution of carbonate rocks such as limestone.)"

It would have been "nice" for AECOM to consider and comment on this phenomenon.

Acres upon acres of native vegetation will be destroyed. To state otherwise is wishful thinking. It will look ugly for years to come because CWS will move on as fast as possible to make money as fast as possible. Augmenting natural re-vegetation by spending that money on native seeds and plantings is unlikely and not about to be enforced by the never-vigilant MCC. But, "10 years" until the "reestablishment of trees and shrubs" is deemed "minor" and "negligible."

As expected, AECOM assesses disruption to wildlife as "negligible." The areas about to be invaded by CWS are sparsely populated, and residents have long happily co-existed with all manner of mammals that have enriched our lives. Don't you dare suggest that 24-7-365 industrial activity will not seriously disturb the breeding, for example, of birds and mammals that are indigenous to our neighbourhoods. To describe this as "negligible" is presumptuous and ill-informed. It displays classic come-from-away arrogance.

Do not ignore or under-estimate the long-term negative impacts on the mental health of residents. We do not get to turn on a tap and water flows from Shoal Lake. We are responsible for our own wells, and that alone limits our presence here. Bottled or trucked water is no alternative. There already have been horror stories in Springfield as a result of the manipulation of water resources.

AECOM's comments on traffic are disingenuous. They slough off truck traffic by referring to the slurry lines that will carry the slurry. So, what will carry the slurry lines? Trucks, that's what. Whenever a line must be moved, and it will apparently happen frequently, the trucks and loaders will be fired up. Furthermore, when in operation, the slurry lines will be monitored (I hope) by people in trucks driving from site to site and along the route. This intensive, industrial

assemblage of drilling rigs, hydraulic pumps, slurry lines, tractors, diggers and loaders operating around the clock is deemed by AECOM to be a "minor" increase in traffic! Outstanding!

It is arrogant to dismiss the impact on aesthetics as minor. I guess ugliness, like beauty, is in the eye of the beholder. What does AECOM not understand about mechanized, industrial consumption on the landscape at all hours, every day, throughout the year?

Conspicuous by its absence (except for a modest reference regarding wildlife) is light pollution. Twenty-four-hour operation will require high candle power illumination. Site security will require the same. Trucks and other vehicles will travel the roads 24 hours a day, casting light into the prairie darkness. MCC has steadfastly refused, over the years, to acknowledge the harm done by light pollution. I just don't know why. They have never explained despite my appeals. Do you know that 80% of North Americans can no longer see the Milky Way because of light pollution? And along comes corporate Canada to confiscate more darkness.

The following are some omissions from AECOM's product. I am sure that other unfunded volunteers will offer more.

Clean Environment Commission

The CWS proposal clearly demands the CEC's participation. It is massive in scale and fearful in risk. Secrecy over several years has so far been its defining feature. The best drinking water on the planet is at risk. But the CEC is MIA. According to Norman Brandson, a former deputy minister of Conservation and Water Stewardship, the CEC is in a state of hibernation and slumber (*Winnipeg Free Press*, August 4, 2021).

Too bad, because it is the CEC which should be leading the public through AECOM's verbiage, not me and other unpaid volunteers.

In 2006, the CEC reviewed a proposal from the Pembina Valley Water Cooperative to use the Sandilands aquifer. That plan carried risks similar to the CWS proposal. The CEC rejected the Cooperative's plans. It should do the same to CWS because it cannot withstand scrutiny when subjected to independent experts, sworn testimony and intervenor funding.

On November 8, 2020 I wrote to the CEC to ask it to invoke Section 6.3 of *The Environment Act* which empowers the CEC to, **on its own volition**, investigate any environmental issue in Manitoba. My letter was ignored and a negative response only received 6 months later when I asked a second time. Mr. Brandson is wrong. **The CEC is not sleeping, it is dead.** Only a directive from the minister can resurrect it. If not now, when?

CanWhite Sands Corp. Finances

Nowhere, absolutely nowhere in AECOM's term paper, are we informed regarding the CWS financial condition. All we get from CanWhite's hireling is: **"Development of the Project will be funded entirely by CanWhite and will be owned and operated by CanWhite"**. That's it. Eighteen words on which to rely that CanWhite has short term working capital, long term financing, dependable investors, affordable interest rates from supportive bankers, adequate liability insurance and so on. You know, the due diligence that any schmuck is called on to produce before buying a used car. Good grief, we have turned over silica sand mining on 1,200 square miles of our province and are on the brink of approving an intrusive and consumptive industrial operation with significant consequences to, ultimately, thousands of families. But we are not allowed to learn of the possible financial weakness of a private corporation that is not listed on a stock exchange anywhere in the world?

When the sand hits the fan (as it likely will), can CWS pay the damages? Can its anonymous investors be held liable? Will the company post bond? I expect the answers are no, no and no.

Complicit politicians and timid civil servants often repeat the mantra that the "economy and environment go hand in hand". How can that be true when a proponent's finances are secret?

Royalties and Water Rent

CWS is planning on profit. What do Manitobans get for the use of our natural resources? What royalties will CWS pay? Will it be charged for the use (rent) of water just like Manitoba Hydro pays? Or, do we just get the crumbs including the minimal jobs quoted in nebulous numbers of AECOM?

Rural Municipality of Springfield

In 2015, the RMS created the Springfield Aggregate Task Force. It was comprised of local politicians, aggregate industry members and residents. The upshot was that the industry would be subjected to a Strategic Environmental Assessment, the first of its kind in Manitoba. The industry representatives gagged, but the politicians and resident members agreed. A subsequent municipal council, under a new mayor, rejected the recommendation. The industry was happy, I guess. I don't really know, because as a member of that Task Force I have yet to be informed of my cancelled appointment... 6 years later.

Had the Task Force been allowed to democratically pursue its published mandate, the examination of the CWS proposal would have been far more demanding. In fact, it may well not have seen the light of day.

Conclusion

The proposal submitted by CWS and documented by AECOM is odious. The concepts of relative risk, the precautionary principle, the prudent person and financial responsibility are grotesquely absent.

The result in Springfield will be two damaged aquifers leading to poorer physical and mental health, as well as reduced property values. The environmental damage will be permanent.

Justice Horace Krever said this in 1997 in his report on the tainted blood scandal:

“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 interest of the regulated.”

Judge, meet the Environmental Approvals Branch.

Yours truly,

C. Hugh Arklie, CPA (ret), BA (Env. St.)

Volunteer, “Our Line in the Sand”
