

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

Heather Erickson

Glen Koroluk

Meradith Anderson

Megan Henry

Janine Gibson

Denis Funk

L. L'Hirondelle

Kevin Albo

Deanna Kazina

James Elmore

Elizabeth Worden and Tony Hajzler

Alex

Suzanne Dienstbier

Joan and Allan Wiens

Janet Nysten

Margaret Marion-Akins

Darryl Speer

I am writing in opposition of the extraction of silica sand in slurry form or any other form from the area surrounding Vivian, Manitoba and also protesting the proposed processing plant that they have proposed for the site. WATER is the most precious element on this Earth. For 42 years I have lived on Pleasant Road east of Anola and enjoyed the most beautiful water in the Province. Now my life style is being threatened by a corporate entity from Alberta. Because this was of concern, I contacted people who are aware of the science involved in such a process. I contacted political entities to hear the science. All were in agreement that such a proposition will lead to the contamination of my water source, significant draw down, in short it will have a negative effect on all the residences in the eastern part of Springfield, not to mention Brokenhead, Tache, Ste. Anne, Steinbach, Lorette, Woodridge, the RM of Reynolds etc. As the Government representing the interests of voters, I would suggest that this application for extraction of silica sand and any subsequent or former application for a processing plant be denied in the interest of those who elected the current government.

There are other concerns with respect to this application, The lives of the residents of the quiet hamlet of Vivian will be forever altered and not for the good. Highway 15 on which over the years the traffic has increased will further be increased. A pristine forested area that is home to wildlife and birds will be destroyed.

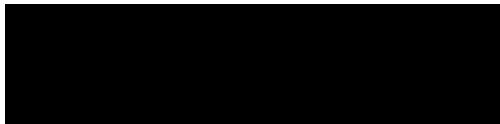
I implore you not to approve this application.
Heather Erickson

Please find our comments in regard to Public Registry File 6119.00, CanWhite Sands Corp silica sand project.

Sincerely, Glen

--

Glen Koroluk
Executive Director
Manitoba Eco-Network



The Manitoba Eco-Network is located on the original lands of the Anishinaabeg, Cree, Oji-Cree, Dakota, and Dene Peoples, and the homeland of the Métis Nation.

Attached Comments:



MANITOBA ECO-NETWORK

3rd Floor 303 Portage Ave., Winnipeg MB R3B 2B4
[REDACTED]

October 7, 2021

Honourable Sarah Guillemard
Minister of Climate and Conservation

Laura Pyles
Director of Environmental Approvals
Conservation and Climate

Honourable Ralph Eichler
Minister of Agriculture and Resource Development

Public Registry
publicregistry@gov.mb.ca

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

Dear Minister Guillemard, Director Pyles, and Minister Eichler,

This letter is in response to the Environment Act Proposal (EAP) for the CanWhite Sands Corp. Silica Sand Extraction Project. Since 1988, the Manitoba Eco-Network (MbEN) has promoted positive environmental action by supporting people and groups in our community. Local residents have been in contact with us and have been expressing serious concerns about CanWhite's silica sand extraction and processing activities in Manitoba since CanWhite announced its intention to develop the Vivian Sand Facility and Sand Extraction Projects. This includes concerns about the potential impacts on the environment, particularly the Winnipeg Sandstone and Red River Carbonate aquifers and associated drinking water, and human health. There has also been significant concern about the environmental assessment process and the fact that the Government of Manitoba has allowed CanWhite to separate their directly related activities into two separate assessment and licensing processes.

To facilitate meaningful public participation, MbEN requests you consider CanWhite's combined silica sand activities as a Class 3 Development and require a Clean Environment Commission (CEC) public hearing with participant funding. The CEC should initiate a public outreach program to get input on the terms of reference for the hearing and participant funding program. Until a public hearing is held for at least the silica sand extraction activities, and further information is provided to fill gaps in currently available public information about CanWhite's proposed plans, no Environment Act Licence should be issued for either of CanWhite's proposed silica sand projects, including the Vivian Processing Facility.

We recommend the delay of the public hearing and licensing decision until more comprehensive information is made publicly available, such as:

- the draft guidelines issued by the Government of Manitoba and used by CanWhite to produce their EAP Report;
- the independent hydrological study currently being undertaken by Municipal Governments potentially impacted by the development;

- other documents referenced in CanWhite's EAP Report including the Water Management Plan, Groundwater Monitoring and Impact Mitigation Plan, Mine Closure Plans and Environmental Emergency Response Plan, to improve the transparency, accountability and legitimacy of the impact assessment and licensing process;
- documents and studies conducted by the Province of Manitoba, to ensure the sustainability of CanWhite's novel silica sand extraction process, and the protection of the potentially impacted aquifers (for example, the status of the Southeast Regional Groundwater Management Plan, and its applicability to this project; any new research since the work referenced in *Silica in Manitoba* by D.M. Watson (Manitoba Energy and Mines Geological Services, 1985), which concluded the proposed silica sand extraction methodology is not viable); and
- an independent review of the groundwater model provided by CanWhite, as well as an independent review of the geochemical groundwater assessment provided.

MbEN has heard a broad range of concerns from local residents and concerned citizens about the problematic and confusing planning and impact assessment process that has been undertaken by CanWhite in the past few years. To date, the process has failed to facilitate meaningful public participation and has not meaningfully included potentially affected Indigenous communities that have publicly stated their concerns with CanWhite's proposed silica sand activities. For example, the two public meetings conducted by CanWhite (one for the silica sand processing activity and one for the silica sand extraction facility) were timed to minimize public inclusion in the EA process, and concerns expressed by participants at these meetings were dismissed and inadequately addressed.

In summary, there continues to be a long list of potential environmental and health impacts that local residents and concerned citizens do not feel have been adequately addressed by CanWhite or the Government of Manitoba. Public concerns include, but are not limited to:

- the effects of the new, unproven mining methods proposed for the extraction activities;
- subsidence due to sand and water withdrawal from the extraction process, and the potential to cause ground and surface water contamination and sinkholes;
- the effects of the extraction activities to the health and wellbeing of workers and nearby residents, including the risk of silicosis;
- potential for light, noise, and air quality impacts;
- the effect of the extraction project on the aquifer including water levels, recharge, sustainability of use, and pollution from acid rock drainage;
- the feasibility of reclamation of the aquifer if it becomes contaminated; and
- potential contamination of surface water bodies, such as the Brokenhead River via runoff from the Project site(s) and accidental or intentional discharge of contaminants.

There has also been minimal to no discussion of cumulative impacts and climate change considerations despite the clear connection between all proposed silica sand activities and the significant amount of truck and rail transportation involved. It is also unclear as to what the extracted and processed silica sand will be used for. There is documented proof from the proponent that the majority of the silica mined will be used as a proppant for the oil and gas fracking industry, despite a lack of recognition of this potential use in the EAP Report.

The Government of Manitoba has a duty to protect lands, waters and air, public health, and the interests of the public. As a proposed development that requires numerous permits, licences and approvals it is important that CanWhite's proposed development meets the principles of sustainable development recognized by the Government of Manitoba and embodied in *The Mines and Minerals Act*,

which requires government and industry to work with local communities to ensure the preservation of the environment for the benefit of present and future generations, share responsibility for sustaining a sound and healthy environment, protect and enhance the ecosystems of the province, and rehabilitation of land that is damaged or diminished by mining activity (*The Mines and Minerals Act*, s 2(2)). In this regard we are concerned that CanWhite has used legal intimidation tactics such as the issuance of cease-and-desist letters in early 2021 in an attempt to silence concerned community members who were publicly sharing their concerns with CanWhite's proposed development.

To balance the economy with the environment, MbEN also recommends the Government of Manitoba require more publicly available information about the financial history and plans associated with CanWhite's proposed development to assure the public that the development is financially viable and there is minimal likelihood of stranded environmental liabilities in the future. There is rightful concern, as we have been made aware of CanWhite's CEO's history with the Alberta Securities Commission, whereby there is potential that CanWhite would not be able to cover the cost of future closure and remediation activities, especially if an emergency spill and contamination of groundwater were to occur.

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

Sincerely,

Glen Koroluk
Executive Director

Heather Fast, B.A., J.D., LL.M.
Policy Advocacy Director

Hello there.

My name is Meradith Anderson and myself, my husband, 9 year old daughter and pets live across the street from the land and rail project of the silica project. Our address is

[REDACTED]

We only have one well. Our only form of life. No public town water and none in site. The aquifer is the ONLY way to feed my family. So the concern for us is HUGE, that this project will wreck the table we pull our life/water from.

I have been concerned about this project from the get go. I had questions that I asked and were "answered" in town hall meetings.. "we need to do more research" they said. What happens when the water goes bad?! What will happen to my family?

I suffer from Multiple Sclerosis and already have a weakened immune system. I'm worried about the dust from the silica causing sickness or cancer which it's known to cause, affecting my family.

The plant is to run 24/7/365... we moved here for the silence of country life not EVERYDAY! Their rail yard and the "bumping" of cars is another noise problem.

This ending is already written. The forest is cut down, the land is stripped and I know it's moving forward regardless in my opinion. What I really need to know, is what about the water???? What will happen to my Well, to my house, pipes, the birds and animals who rely on it! What about the water???

Appreciate any information you can provide.
I thank you for your time.

We need clean water.
Meradith Anderson

My family has concerns with this project moving forward as is. There are too many pieces missing in the planning to realistically approve this project.

Furthermore in regards to water usage. Not only does the entire South East rely on the aquifer, but both Morris and Winnipeg are also interested in sandilands for their drinking water.

With so many people relying on this area for fresh water there is no way this project can be entertaining without was more due diligence.
I personally want more information and accountability in regards to their exit strategy.

Megan Henry

Dear Community Leaders,

Thank you for your leadership and your time in considering our concerns about the lack of oversight of the Can White Sands (CWS) Vivian Mining Project.

As a citizen scientist and a founding member of Our Line in the Sand Manitoba, I am requesting we hold a Clean Environment Commission Hearing on the Facility and Sand Mining Projects proposed by CWS.

Other citizen scientists in our group have articulated in a detailed manner, very concerning oversights in the CWS Project that need to be addressed prior to CWS continuing their project.

I have direct experience with misrepresentation from Brent Bullen, CWS CEO which I feel compelled to share in the interest of environmental justice.

In June of 2020 I attended the ungated, unfenced, unmarked Vivian site with a group of concerned citizens and some media, to warn the locals about the dangers of inhaling fresh silica. During that event I examined the entrance areas (approaches from the municipal roads) to two different CWS parcels on Centre Line Road near Vivian with piles of silica uncovered, unsecured in any way.

Please refer to photos on our website.

<https://ourlineinthesandmanitoba.ca>

I am a professional agricultural consultant serving as an Organic Verification Officer, so am trained in agricultural assessment, and collecting soil, water and tissue samples. No where around either approach was the land disturbed in any way. Such disturbances would have occurred had either approach ever had a gate across it. Gates require anchor posts, which require ground disturbance.

Brent Bullen of CWS responded to our concerns about no control of access to the site, by saying they had erected a gate at the Centreline Rd site and it had been stolen. Close examination of the approaches by myself in June of 2020 revealed no supports of any kind had been erected or removed, because there was no ground disturbance at any of their site approaches. If a gate had ever been purchased by CWS it must have been stolen before it was erected, if in fact such a gate ever existed.

From the unfenced, unmarked, ungated Vivian CWS site, in June of 2020, I collected a number of sand samples, following lab protocols and completed Chain of Custody paperwork, of what visually appeared to be freshly piled silica. It was pure white and did not appear to be mixed with any other debris in any way. I am a trained professional in collecting pure samples for verification purposes.

Our ALS Environment Lab report results conflict with the official CWS silica analysis declarations, in that our samples showed the silica samples had a .047 presence of iron pyrite that would need to be removed for the sand to be marketable. This removal process results in highly toxic acid runoff with significant impact likely to the immediate environment and the watershed. Bullen responded to this concern by saying the sand I sampled was contaminated and does not reflect the purity he insists is there. The samples collected were not contaminated and I have retained a hold back sample to verify our earlier findings if that proves to be helpful in any way.

I firmly believe CWS lacks integrity in their community communications and despite their claims to the contrary, they are not being good neighbours. Good neighbours would respond honestly to concerns and not push forward in the disrespectful manner we are observing.

Please support the citizens whose drinking water aquifer is being threatened by this disingenuous company. Hold a Clean Environment Commission hearing with funding for presenters, so you can review unbiased research on these CWS Projects.

Clean drinking water is essential. Too much is at risk with these projects!

Sincerely,

Janine G. Gibson
Principal Verification Officer
Creative Health Consulting

Good evening,

I am writing this letter because I'm concerned about the proposed silica sands mining project in south-east Manitoba.

I'm requesting a full clean environment commission hearing with participant funding because this project raises too many important questions which lack answers.

Drilling a bunch of holes through our precious aquifer doesn't seem like a good idea, especially if there is no plan to seal the wells. the risk of contamination is too high. the whole project lacks very important details, and this is why there needs to be a full environmental impact assessment.

Please do not let this project go through without keeping Canwhite sands accountable.

Please consider the thousands of Manitobans that depend on this necessity of life. If the aquifer is somehow contaminated, the calamity of having all of rural S-E Manitoba under a boil water advisory, or having to truck in water, it's hard to imagine the cost.

thanks for hearing my concerns
Denis Funk

To All it Concerns:

I am concerned for the future of the water in the Sandilands Aquifer due to the project proposed by CanWhite to extract Silica Sand in this area. Projects such as these have been known for causing long term health and environmental damage. There is no convincing evidence to me that the water will be protected for those living and using the water for their drinking including my children and grandchildren. At the very minimum, I implore you to do your due diligence and protect the public trust, not just that of those out to make money. The environment can NOT be replaced. Please have a Clean Environment Commission Public hearing, and a full Environmental Impact Statement (EIS) developed that would provide a detailed assessment that would include the input of key stakeholders including: What the Frack, MB, Our Line in the Sand (MB), The Brokenhead Ojibway Nation, and the Manitoba Metis Federation in the development of guidelines for the preparation of the EIS. I look forward to your response.

In Regards,

L. L'Hirondelle

To whom it may concern,

I am a resident of the RM of Springfield, and I am greatly concerned with the CanWhite Sands Corp. Silica Sand Extraction Project (file #6119.00). They have not been forthcoming with information, and have failed to publicly address any of the serious issues raised by thousands of residents in the area. An independent review of the project needs to happen. Far too many people will be affected by this proposed project if it goes through. A Clean Environment Commission should be convened to review CanWhite Sands Silica Sand Extraction Project. There is so much contradictory research to the information that is being provided by CanWhite Sands Corp, indicating that the aquifers and drinking water for thousands of Manitobans will be contaminated. It would be a travesty of justice, and governmental malfeasance to allow this project to go through without conducting independent reviews and studies to ensure the safety of residents and the vast ecosystem in this region.

Respectfully submitted,

Kevin Albo

October 7, 2021

To Those Concerned,

As a Metis person, a mother of two small children, and a South Eastern Manitoba resident, I am extremely concerned with the long term environmental and social impacts of the CanWhite Sands Extraction Project.

CanWhite Sands assures concerned citizens that the aquifer will not be disrupted in any way by their business. This is confusing in the sense that CanWhite Sands has mitigation plans for homeowner's well water decline – solution, in their own words during their August 24th open house will be to truck in water! First, how many people who will read this letter or work with CanWhite Sands have ever experienced a situation without running water? Yet CanWhite Sands seems to make light of this situation judging by the discourse in the open house. Like somehow it is not a big deal that your well - your only source for drinking, feeding your animals, bathing your children is disrupted. Secondly, this in itself is contradictory and highly suspicious – not that companies shouldn't have disaster planning but rather how do you trust a company that says one thing but is obviously planning for another.

Even more, during the open house it was noted that CanWhite Sands' own modeling failed to include modeling under various climate scenarios. How can the most important issue facing humanity be overlooked? We have seen how unpredictable the climate has become in Manitoba's own backyard. This last week Manitoba has seen temperatures in the high 20's, breaking heat records - in October. This last summer, we experienced a drought not seen in decades. We heard of farmers having to sell off livestock due to drought and I still pass field after field of dead corn, sunflowers, and soybeans. What if this drought continues or is the new norm? Another of my many concerns is that a company like CanWhite Sands may exacerbate a drought problem by coming into our area to use up the water or force residents into water restrictions due to their activities.

In addition to the above, I would argue as a citizen and participant in the CanWhite Sand's August 24th community 'open house' that it was by no means open. I heard of people being removed from the discussion. I do not understand how someone who has an opposing view is being barred? If this event had happened in a community hall, would a person with an opposing view be dragged out by security? It is understood that COVID has put a limitation on our ability to safely gather, but holding it virtually puts way too much power in the hands of those directing the proceedings. And let me remind you those holding the virtual 'open house' are by no means unbiased.

Part of the land CanWhite Sands proposes to work on is crown land. Metis people exercise their traditional hunting and gathering rights on these lands. What if these lands are poisoned by the chemical by-products of CanWhite Sand's industrial activities

and affect the plants and the animals? The Province of Manitoba has a legal obligation to address Section 35 consultations with First Nations and Metis in the area and has thus far failed to do so. This must be fulfilled in advance of any Environment Licence being issued to CanWhite Sands.

Eastern Manitoba is said to have some of the cleanest drinking water in the world. I don't think that there is anything more important than making sure that it stays this way. If the steps to decide if the project is actually safe – as the company claims - are not fully realized, I fear that Manitoba will be a front page headline – with any potential short-term economic gain of a few jobs being outweighed by a dead aquifer and long-term economic damage.

Moreover, I am requesting that out of respect for all Manitoba's and for the generations to come – the ones who will live with our present day choices that:

- 1) A full Clean Environment Commission review/public hearing for the CanWhite Sands Extraction Project is conducted.
- 2) That an impartial full Environmental Impact Statement (EIS) which provides a detailed assessment of the project and that What the Frack MB, Brokenhead Ojibway Nation, Our Line in the Sand MB and The Manitoba Metis Federation are included in developing the guidelines for the EIS.
- 3) That additional public hearing be held and that at least some events be offered in person.

Thank you,

Sincerely,

Deanna Kazina

To all concerned,

I attended the CanWhite Sands "open house" consultation and asked a very simple question to their expert geographer hired to assess the safety of the project. The question was as follows: Has CanWhite's modelling taken into consideration ongoing extreme weather conditions such as drought, heavy rainfalls or climate change. The answer provided after a longer than expected stunned silence was "No."

This last summer was one the driest on record. With climate change, extreme weather conditions are not something we can cross our fingers and hope will not happen. I do

not want to wake up one day to find my well is dry or receded, or hear that there has been seepage of toxic chemicals because they didn't predict the substrate would react the way it did. Let's do a full impartial environmental assessment. If we are going to put our precious water at risk (which by the way I don't think we should) then at the very least, I demand that the time be taken to seriously consider the potential risks and impacts.

I am requesting that:

- 1) A full Clean Environment Commission review/public hearing for the CanWhite Sands Extraction Project is conducted.
- 2) That an impartial full Environment Impact Statement (EIS) which provides a detailed assessment of the project and that What the Frack MB, Brokenhead Ojibway Nation, Our Line in the Sand MB and The Manitoba Metis Federation are included in developing the guidelines for the EIS.
- 3) The Province of Manitoba fulfills their legal obligation to address Section 35 consultations with First Nations and Metis in the affected areas.

Thank you,

James Elmore

Dear Laura Pyles, Director of Environmental Approvals Branch,

Please find attached our formal submission in response to the Environmental Act Proposal submitted by CanWhite Sands Corp for the Silica Sand Extraction Project. We are requesting that you consider recommending a full Clean Environment Commission hearing and full Section 35 Consultation before proceeding with any approvals on this project.

Best regards,

Elizabeth Worden and Tony Hajzler, residents of [REDACTED] Ste Rita, RM of Reynolds

Attached Letter:

October 7 2021

RE: CanWhite Sands Corp. Silica Sand Extraction Project file # 6119.00

Dear Laura Pyles, Director of Environmental Approvals Branch

In response to the Environment Act Proposal prepared by AECOM for the CanWhite Sands Corp Vivian Sand Extraction Project, I would like to formally express my request for the Clean Environment Commission to be convened and hearings be held to review the CanWhite Sands Silica Sand Extraction Project. I am a concerned resident living on Corbett Road near Ste Rita. My drinking water comes from the aquifer that would be impacted by this enormous mine. I can hear increased train traffic from my home. I recognize the high functioning ecosystem in this area; a resilient and bountiful ecological community that is an increasingly rare occurrence in this ever-fragmented world.

For a development of this magnitude, set to impact such a wide geographic scope and such a precious resource as drinking water, I strongly believe that a hearing involving public, peer-reviewed and independent science is necessary to fully understand and mitigate the impacts of this proposed mine. The government of Manitoba website states; *“Under The Environment Act, The Clean Environment Commission (CEC) provides a mechanism through which the public can participate in environmental decision making. The Commission conducts public reviews and hearings into matters of environmental concern and provides advice and recommendations to the Minister. The Commission, while reporting directly to the Minister, is independent of the department.”*. I cannot think of a more pressing issue, impacting a resource more universal than drinking water, to have a public hearing on. Viable drinking water will only become more scarce and compromised as climate change continues, and this aquifer is considered to be of very high quality.

Various experts, politicians, locals and citizen scientists have produced excellent work in response to this Environment Act Proposal. They have highlighted many issues of concern where the Environment Act Proposal produced by the proponent does not address critical points.

These include:

- Problems with the proposed UV sterilization system. Because of manganese, iron and fine particulate in the water, the UV light treatment will be scattered. Oxygen and harmful microbes would be reinjected into the water, contaminating it. Oxygen would react with sulphide and pyrite to form acid. This is unacceptable and dangerous for those of us who have to drink this water. I refuse to buy bottled water.
- Silica sand samples used in the EAP were exposed to air for a prolonged period of time, meaning that any marcasite would have leached out during this time, spoiling the validity of the sample.
 - o Pyrite can oxidize rapidly when not sealed from air, and the geochemical samples would therefore underestimate sulphide concentrations.
- Concerns with heavy metal concentrations in the shale of the aquifer, including barium, selenium, arsenic and boron.
- The aerated re-injected water would oxidize and mobilize selenium in the carbonate aquifer.

- Selenium is toxic to aquatic organisms above two parts per billion, and the discharge would eventually flow into the Red River. All the water wells along the flow path would be contaminated.
- A spill from the CWS slurry lines that would carry selenium, fluoride, arsenic, other toxic heavy metals, and harmful microbes could drain into fish-bearing water bodies such as the Brokenhead River and Cook's Creek.
 - o The EAP mentions the potential for leakage or spillage from the slurry 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."*
- The slurry line would be expected to carry the extremely toxic acrylamide monomer from the clarifier tank, and it would continue to be increasingly toxic as recycled water continues to be put through the loop.
- In the CWS Virtual Open House, when concerns about a leak from the slurry line were brought up, they responded by describing infrastructure that was not included in the EAP. There was also no discussion of These inconsistencies are extremely concerning and another reason why a Clean Environment Commission hearing is required to clarify and confirm these plans. This is a very real problem with the potential for disastrous outcomes.
- A geotechnical analysis was not submitted for the CWS Extraction Project.
- The negligence in not providing a geotechnical analysis is an extreme weakness in the proposal, as sinkholes and subsidence are very likely to occur and would have enormously detrimental effects to the environment.
- Concerns with the groundwater model simulations in the EAP and how they are inconsistent with reality
- A breach of Section 35 Treaty rights under the 1982 Canadian Constitution Act. No consultations are planned with affected First Nations groups or Metis citizens, even though harvesting and water rights will be impacted should the development proceed. Of special note is Brokenhead Ojibway Nation and Metis citizens of Ste Rita.
- Noise and light disturbance, from drilling site and from train loop.
- Extremely vague and unsubstantiated claims to wildlife, aquatic life and bird disturbance. This is not acceptable, as disturbance is inevitable and negative effects that are concerning for humans are also applicable to wildlife.

These only encompass a fraction of the concerns outlined by professionals, citizen scientists and stakeholders to the surrounding environment. In conclusion, I implore you to fulfill your duty as Minister to this department and do your due diligence to ensure that this very worrisome project be given proper consideration through full Clean Environment Commission hearings AND through proper Section 35 Consultation with affected Indigenous peoples. Laws were written for a reason and I beg of you to uphold them, otherwise, what is the point of democracy?

Regards,

Elizabeth Worden

Resident of [REDACTED] Ste Rita, Manitoba

1. As a concerned resident of the area I request a full Clean Environmental Commission hearing for this project (extraction)
2. Applicant to clarify where else in the country this extraction method is used ?
3. Applicant to provide sealed engineered drawings for Sand Extraction Circuit Process and method
4. *Manitoba Groundwater and Well Water Act* explicitly prohibits the mixing of sandstone aquifer water, with carbonate aquifer water. Why applicant is allowed ?
5. A Waste Characterization and Management Plan, Groundwater Monitoring and Impact Mitigation Plan to be developed and submitted for review prior license is issued.
6. A Progressive Well Abandonment Plan to be developed and submitted for review prior license is issued.

thanks
Alex

In regards to the following:

**CANWHITE SANDS CORP. – SILICA SAND EXTRACTION PROJECT – FILE:
6119.00**

I have serious concerns about the proposal. I have lived in the area for more than thirty years and enjoyed high quality well water and access to land to harvest as is my right as a Métis citizen.

I have read information CanWhite Sands has provided and I feel it is insufficient. This project should not be allowed to proceed without much more study on its impact.

What guarantee do they make that this method of drilling won't contaminate the aquifer?

What will CanWhite Sands do to allow access to traditional harvesting land for berries and mushrooms?

What guarantee do they have that slurry lines won't disrupt patterns of movement for area wildlife?

What evidence can they provide that slurry lines and drilling are 100% safe?

Water for humans and animals is of paramount importance and should always be protected.

Sincerely,
Suzanne Dienstbier

Dear Sir/Madame:

We are writing to express our serious concerns regarding this project and it's potential impact on the availability and quality of groundwater in the RM of Springfield.

We specifically moved to the RM of Springfield over 30 years ago to enjoy the wonderful quality of rural life it could offer, including clean drinking water. After reviewing the information available about the way the operation would work, the background and experience of the company, and the other potential environmental impacts, we have huge concerns. How can we be assured that there will not be significant and long term impacts? We cannot expect that drilling up to 500 wells annually (for 25 years) to a depth of 200 feet and cycling water back into the aquifer will not result in dramatic changes to both the quality and availability of water to our home and to the residents of this RM, and subsequently to the value of our investment here.

Sincerely,
Joan and Allan Wiens

Please accept my submission opposing the CanWhite Sands Silica Sand Extraction Project. I had confirmed with Jamil of your department that you would accept submissions as per the Notice in the August 12,2021 Clipper that printed the deadline as October 12, 2021.

I would appreciate confirmation of receipt of this email. Thank you.

Janet Nylen

Attached Comments:

SUBMISSION FROM: JANET NYLEN



RE: Manitoba Environment act Proposal Public Registry 6119.00

CanWhite Sands Corp. Silica Sand Extraction Project

As advertised in the Clipper newspaper on the August 12, 2021 issue I am submitting this by the stated deadline of October 12th.

Please accept this submission as my strong opposition to the CanWhite Sands Corp.: Silica Sand Extraction Project, and my request to the Environmental Approvals Branch to not issue a license for the project.

For almost two years local residents have expressed concern regarding the proposed Silica Sand Extraction Project that is utilizing untested methodologies, incomplete testing models, dividing the project into two separate applications and not fully addressing key issues such as risks to the local water supply as well as to the environment.

It is important that during this Environmental Review process that Springfield citizens' concerns be heard and addressed and that all Manitobans can expect the Department of Environment to protect the quality of the environment and environmental health of present and future generations and provide the opportunity for all citizens to exercise influence over the quality of their living environment. This is even more so because attempts to elicit advocacy from our local municipality to voice our concerns and get responses to our questions re: the CanWhite Sands proposed operations, have repeatedly been deflected by Springfield Council who have published: "*That mining minerals in Manitoba is a Provincial jurisdiction (not municipal)*".

Summary of concerns:

1. The splitting of a single proposed mining operation into two separate licensing processes; one for the extraction of the silica sand and the other for the processing it; fails to provide the Review Board and the public with the full scope of information and potential impact that this project will cause. It is impractical to think that if a license for the extraction of Silica Sand is approved that the next application for processing the product will be denied. The two are interdependent and should be considered at the same time.
2. This application is limited to the proposed activities and project spatial extent from now until and including 2025. Extraction activities are projected to progress further from the Processing Facility in blocks of land each year over anticipated life of the project which is estimated at 24-years. The current application is for only 4 years and CanWhite states this is "*because it anticipates advancement in extraction methods and operations that are expected to increase efficiency and reduce the overall footprint.*" It would be another opinion that it is a period to determine if the untried extraction process is experimental or if it can be a viable project.

3. The proposal minimizes the overall number of wells that will be drilled during the lifetime of the project by focusing on a yearly average of 56 well clusters consisting of seven wells each being sequentially developed and progressively decommission and rehabilitated each year. The project actually intends to drill more than 9000 production wells and this number should be expected to be more because it is anticipated that there will be many other wells drilled that will not or cannot be used for sand production purposes. The potential impact of the overall number of wells penetrating the Winnipeg Formation Sandstone Aquifer is of critical importance for the protection of the quality of our water supply and the future health of south eastern Manitobans.
4. The wells being drilled are much larger than the average residential type well as they will be between 16 inches (40.6 cm) and 8 inches (20.3 cm) in diameter. They will be approximately 200 feet (61 m) below ground surface. The size and depth and number of wells being proposed significantly increase the risk of contamination to our irreplaceable aquifers. Protection and safe management of our water resource should be paramount.
5. The wells will pass through the Carbonate aquifer, penetrate the shale aquitard and extend into the Winnipeg Formation Sandstone Aquifer and as such will most likely contribute to interconnections between the aquifers increasing the risk of contamination and a change the chemical makeup of the water.
6. The proposed extraction of material through wells drilled in clusters of seven with one well in the middle and the others about 60 m apart will leave a void in the shape of a cone extending from the bottom of the Carman Sand Member to the base of the Winnipeg Shale. As the scope of the extraction area increases, so will the number of these voids. This raises concern about the shale layer weakening, fracturing or collapsing and the barrier between the aquifers being breached. Such slumping could result in the mixing of groundwaters which would put further risk of reduction in the quality of the water from either of the aquifers. The potential for subsidence although not addressed in the EAP, must be addressed as part of this application process as it represents significant risk and long term adverse consequences to Manitoba's fortunate and enviable supply of quality water.
7. There are approximately 1500 domestic wells within the first phase of the project area. The depth of the majority of these wells end above the shale aquitard in the Carbonate aquifer. Interconnections between the aquifers increase the risk of contamination and reducing the quality of potable water from the existing

wells. The draw from the CanWhite Sand extraction processing is likely to lower the water table and reduce the availability or quantity of water from existing wells. Normal recharge through snow/rainfall will be hampered not only by drought (as in this year) but with year round drilling of wells and extraction for mining purposes. Protection and safe management of the water resource Manitobans in the south east part of the province is essential.

8. The specific process of how the materials will be pumped from the cluster of wells is not clearly identified but it will most likely add air into the well systems, which along with the proposed re-injecting of “excess” water from the groundwater slurry could likely cause a chemical change to the groundwaters. The proposed ultra violet treatment of the water may be an inadequate and insufficient process to protect the quality of the water.
9. `At an extraction site, during the period between April to November, the water portion of the sand and groundwater slurry that is brought to the surface through the extraction wells, will be separated from the sand. Then the excess water portion is to be returned to the aquifer via the sand producing well after being treated with ultraviolet light (UV). Through some un-described type of de-watering process the slurry is to be pre-screened to remove large particles (overs) before it enters the slurry transport loop. During this process, the “excess” water will most likely be exposed to the air as well as a number of potential sources of contamination, including particles and fluids from the equipment being used during the process. It is not clear how the UV treatment will be controlled. It will have to be a mobile unit, have to have an appropriate power source, be of the correct intensity, have the correct threshold for exposure times and the “excess” water must be clear and colourless for UV to be effective. It is difficult to conceive that the “excess” water will always be in a similar and consistent condition throughout the various locations of the well clusters, operational conditions through the months of April to November, etc. UV treatment is expensive and more suited to a residential type use than the proposed one. This singularly proposed treatment needs more substantiation and study.
10. The slurry transport loop has been described as consisting of a movable system made of 14 inch (35.6 cm) polyethylene plastic pipes of unidentified thickness. This is insufficient information to thoroughly evaluate the process. Many questions need to be answered because the pipes will be under pressure to maintain enough flow rate, and they will be exposed to the elements, heavy load use, and continual scoring along the walls etc. They will also have to accommodate variability in the distances to transport materials, the volumes of material, wear and tear etc. Questions needed to be answered include: How

will the lines be monitored for ruptures or breaks at the flanged connections? How often will they be inspected and/or replaced? After use each move to another cluster, how will the lines be cleaned and tested? What happens to the lines over the winter months how will they be secured? These concerns will only increase over time as the well clusters move further away from the processing plant and the transport lines become longer.

11. The area of the province where this project is proposed although seen as being less populated by many standards still has a number of families and farms located there who have a right to have their health, water and environment protected. This proposed industry will change their way and quality of life permanently if it is permitted as presented. Although in my opinion, protecting the water is of the utmost importance, I feel that mentioning the natural environment of the area is also important and should be considered. CanWhite Sands Corp. have already cleared large areas of forests and trees, in preparation of the rail loop. Mining operations that operate for 24 hours a day, 7 days a week will disturb not only the residents but also the wildlife that exists there. Noise, air, light will pollute the atmosphere, while disruptions to habitat, overland flooding will pollute the land.

Conclusion:

In their submission: The CanWhite Sands Corp. - Silica Sand Extraction Project's assessment of potential risks caused by their operations, trivialize many of them but in particular the stated "minor" risk to contamination of the aquifers. It is obvious it is in their interest to say this, but it doesn't make it true. Springfield residents are very fortunate to have a precious and enviable supply of quality water and we must take every effort to safeguard our aquifers. This should be of particular importance now as we have seen this year undeniable impacts due to climate change including alarming water shortages in many parts of the province and parts of North America.

Our natural resources are finite and most are irreplaceable. The pursuit of immediate economic development, jobs and industry, should not outweigh the long term sustainability and accountability of our environment for our future and the future of generations to come.

October 12, 2021

E. Allan Akins
Margaret Marion-Akins

Environmental Approvals Branch
Manitoba Conservation and Climate

Re: CANWHITE SANDS DORP. –SILICA SAND EXTRACTION PROJECT – FILE;
6119.00

Please accept our letter of opposition to the Silica Sand Extraction Project by CanWhite Sands. In the August 12, 2021 issue of the Clipper Newspaper, the deadline was indicated to be October 12, 2021.

The drilling of over 9,000 wells through the Red River Carbonate Aquifer, the shale aquitard into the Winnipeg Sandstone Aquifer represents significant and un-reparable risk to the quality water source Springfield relies on for most of its potable water by creating or causing interconnections between the aquifers.

The drilling of wells that reach below the aquitard and extracting the silica sand along with excess water will cause voids below the base of the Winnipeg Shale which raises concern about the shale layer weakening, fracturing or collapsing thus breaching the barrier between the aquifers which could result in the mixing of the groundwaters and further put the quality of our water at risk.

There are approximately 1500 domestic wells within the first phase of the project area, most of which do not extend into the sandstone aquifer. Interconnection between aquifers will reduce the quality of their water and may also risk the availability of water due to a potential draw down of the water table.

The proposed re-injection of excess water from the groundwater slurry that is extracted from the wells is very concerning in that it may further contaminate the aquifers by introducing outside influences into it. The proposed UV treatment is likely insufficient to remove all risk arising from injecting the water back into the aquifer.

The splitting of CanWhite Sands Silica Sand Project into two separate environmental licensing applications fails to provide a full and clear scope of the potential impact that this project will cause to the area residents.

The proposed method for mining the silica is not supported in their EAP and it is understood to be new and untested. It is concerning that unproven methodologies

would be allowed particularly without the company having in place fully accountable, mitigation, rehabilitation and compensatory plans for area residents.

Sincerely,

Margaret Marion-Akins

E.Allan Akins

Attention: EAB

Attached is my submission on CanWhite Sands File: 6119.00

Thank You,

Darryl Speer

Attached Submission:

Darryl Speer

October 12, 2021

Environmental Approvals Branch

Manitoba Conservation and Climate

1007 Century Street

Winnipeg, MB. R3H 0W4

Re: CanWhite Sands File: 6119.00

I do not accept CWS/AECOM's position that "the overall effect of the proposed extraction process is expected to be positive or negligible", as stated in their August 2021 Update Notice.

Mining;

1) Their exploratory boreholes evidenced breeches of mining protocols.

a) Dying trees bulldozed into live trees

b) Unkempt sites

c) Unsealed boreholes

d) Silica sand piles uncovered, un posted, unmonitored and accessible for locals to recreate in.

This speaks volumes about CWS and their contractors as they began their mining in Springfield.

- 2) The prospect of this continuing at 56 sites of 7 wells each per year for 24 years is unthinkable.
- 3) Also unacceptable is their plan to remove 21,000 tonnes of silica per site creating caverns 175' in diameter, 200' apart in the 'room and pillar' method. These 'pillars' being collapsing silica sand in a water matrix.
- 4) The fragile Winnipeg Shale layer overlying this formation, thus compromised, will fail along with the well seals to the carbonate above, causing an intermingling of aquifer waters-contrary to Ground Water Regulations.
- 5) The fractured limestone of the carbonate formation will then slump creating sinkholes-conduits for surface contaminants to pollute these aquifers.
- 6) The prospect of 'mine process' water being treated by ultraviolet is not viable considering the turbidity factors=contaminants then not dealt with must not be returned to the wells.
- 7) Slurry line transports pose serious logistics for relocating every 5-7 days on multiple wells, and back to the main processing plant with road crossings and draining and rupture cleanups, etc.
- 8) Major environmental disruptions will be created in clearing for staging for equipment for drilling, extracting, pumping, and power access.
- 9) Contrary to CWS assurances-"surface immediately returns to natural state within weeks of harvest completion"-not the case with the marginal soils in this locale.

The devastation that CWS's project will inflict on the environment, wildlife and area residents is unacceptable.

I believe AECOM, Jeff Bell of Friesen Drillers and all others contracted by CWS, to be biased in the consultations they have provided for this EAP.

For a pristine water source with glacial origins to now be subject of an experimental mining enterprise is Dead Wrong.

I would ask that the highest agency possible be assigned to this application and that intervener funding be provided so that this threat to our water source and the environment be fended off.

I would ask that you accept my submission in consideration of the extension to October 12, 2021, as advertized in The Manitoba Gazette.

Yours sincerely,

Darryl Speer
