

Potash and Agri Development Corporation of Manitoba Ltd. (PADCOM) – Potash Mine Environment Act Proposal – File No. 6126.00

The attached information can be placed in the public registry for the above project:

Technical Advisory Committee Comments on the Environment Act Proposal (19 pages)

Agriculture and Resource Development – Mining, Oil and Gas – November 13, 2021

Agriculture and Resource Development – Groundwater Management, November 15, 2021

Conservation and Climate – Air Quality, November 15, 2021

Conservation and Climate – Office of Drinking Water, November 1, 2021

Conservation and Climate – Drainage and Water Rights Licensing, October 26, 2021

Conservation and Climate – Water Resource Officer, October 27, 2021

Agriculture and Resource Development – Water Branch, November 10, 2021

Agriculture and Resource Development - Wildlife, Fisheries and Resource Enforcement, November 9, 2021

Conservation and Climate – Forestry and Peatlands, November 3, 2021

Infrastructure – Highway Engineering, November 12, 2021

Conservation and Climate – Parks and Protected Spaces, October 28, 2021

Agriculture and Resource Development – Petroleum Branch – November 4, 2021

Conservation and Climate – Environmental Compliance and Enforcement, November 17, 2021

Agriculture and Resource Development – Lands Branch, November 18, 2021

From: [Kennedy, Tafa \(ARD\)](#)
To: [Winsor, Jennifer \(CC\)](#)
Cc: [Chopek, Karen \(ARD\)](#)
Subject: RE: Draft review comments - Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00
Date: November 13, 2021 6:14:36 PM

Hello Jennifer,

Please find MOG's comments for the draft EAL.

- All drawings and figures should be to scale, with legend, scale bar and north arrow.

Page#	Section#	Comments
11	1.1 Project Overview	Require clarification on the extraction amounts and the number of drill holes.
21	1.4 Project Location and Land Tenure	Detailed map with scale and legend, a survey drawing of the area would address this.
28	2.2.1 The Beechy Solution Potash Mining Technology	Need more information and clarification on the extraction process.
32		Scaled diagrams needed to make further comments
39	2.7.6 Process Water Pond (and Borrow Pit)	Need more information on proposed location and type of the material excavated from the pond
42	2.8.2 Subsidence	Scaled, high resolution imagery diagrams and site specific subsidence study needed to make a comment and further clarification on how to detect and measure subsidence.
43	Table 4	Need more information on the study source.
76	7. DECOMMISSIONING	Further clarification needed to make a comment



DATE: November 15, 2021

TO: Jennifer Winsor, P.Eng.
Senior Environmental Engineer
Environmental Approvals Branch
Conservation and Climate

FROM: Groundwater Management Section
Water Branch
Agriculture & Resource Development

FILE: 5.07.04.02

REFERENCE: File 6126.00, Potash and Agri Development Corporation of Manitoba Ltd.
(PADCOM) - Potash Solution Mining Project

In response to a request for a review and comment on an Environment Act Proposal, submitted by Potash and Agri Development Corporation of Manitoba Ltd. (PADCOM) – Potash Solution Mining Project - File 6126.00, the Groundwater Management Section has conducted a review of the PADCOM Environmental Act Proposal (EAP) prepared by Harvey Haugen and Daymon Guillas, dated September 1, 2021.

The proposed solution mining site (the “Site”) is located in Harrowby, Manitoba, approximately 16 km west of Russell, Manitoba, within the Municipality of Russell-Binscarth (28-20-29 WPM).

COMMENTS

Brine Injection Well

Sections 2.7.7, 2.11, 6.1.4, and 6.1.5 provide information on the proposed brine injection/disposal well. Both the Cretaceous Swan River Formation and the Devonian Winnipegosis Formation were identified as disposal formations. The EAP states that the “mine will inject up to approximately 100-200 us gpm.” The EAP also states that the well will be used for salt disposal if needed early in development, for control of magnesium levels as needed, and for the unlikely accumulation of excess water.”

The EAP does not provide detailed construction information for the proposed injection/disposal well, states two possible disposal formations, and does not detail how groundwater that has the potential to provide potable water or water that could be treated to be potable will be protected. Because of the depths of the solution production and injection wells, these will be regulated under The Oil and Gas Act. It is recommended that the wells be thoroughly cased/grouted through all potable water aquifers or aquifers that the water can be potentially treated for potable water use.

Hydrogeology

Section 4.1.4 indicates that six, test holes/water wells were drilled on the Site as part of the Site foundation study. Construction details for these wells were not provided. These well records should be submitted as part of the EAP application and may require submission to Manitoba Agriculture and Resource Development under the Groundwater and Water Well Act.

Process Water Pond

Sections 2.7.6 and 6.1.3 indicate that an unlined process water pond (and borrow pit) will be constructed on Site and will handle “runoff from the immediate area of the plant site.”

Section 2.9.1 states that “small amounts of water will be removed from shallow groundwater on the site to lower the water table. This will also retrieve any possible contamination in that water. Drains will be installed around the plant and terminate in the borrow pit / contaminated water pond.”

Section 6.1.2 indicates that “in the absence of a tailings pond, a system is needed for storage of potentially contaminated surface runoff from the immediate plant area” and that “water will be collected in a perimeter trench feeding the process water pond. Any contamination will be diluted with the fresh runoff water as the pond water is used on a continuous basis for makeup to the mine.”

Section 6.1.3 states that “the pond will be excavated to bedrock and will deliberately not be lined. This will allow local groundwater to seep into the pond, to collect any local contamination, with the normal water level in the pond designed to be at least 1 meter below static hydrostatic level. Drainage tile will be installed around the plant to the pond. A pump will be installed in a riser from that line to return water to the process.”

In addition, “a slurry wall will be installed around the property to isolate any possible shallow groundwater contamination on the site from the surrounding area.” “Groundwater inside the wall will be drained to the process pond to maintain negative pressure within the wall at all times.”

As described in the application, the groundwater quality beneath the site is at risk of degradation from the operation. It is recommended that the operation provide a plan that will protect groundwater in the area.

Please be advised that the review with respect to groundwater conditions is completed based on the information provided by PADCOM. The comments, conclusions & recommendations of the review are solely based on the information provided by others and the Section cannot guarantee that the information that has been provided by others is accurate or complete.

Groundwater Management Section
Water Branch
Agriculture and Resource Development

DATE: November 15, 2021

TO: Jennifer Winsor
Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century Street, Winnipeg

FROM: Muntaseer Ibn Azkar
Air Quality Section
Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century Street, Winnipeg

**SUBJECT: Potash and Agri Development Corporation of Manitoba (PADCOM)
Potash Solution Mine (File 6126.00)**

Air Quality Section has reviewed the above proposal and provides the following comments:

- Based on the provided information, it is expected that the proposed potash mine and potash processing plant may not produce any significant impact on air quality in the surrounding area.
- However, Air Quality Section suggests that the proponent should conform the Environment and Climate Change Canada (ECCC)'s **“Code of Practice for the Management of PM_{2.5} Emissions in the Potash Sector in Canada”** appropriately.

From: [+WPG530 - Drinking Water - Approvals \(CC\)](#)
To: [Winsor, Jennifer \(CC\)](#)
Cc: [Barlshen, Kim \(CC\)](#); [Burland Ross, Siobhan \(CC\)](#)
Subject: RE: Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00
Date: November 1, 2021 10:46:02 AM

Greetings;

The Office of Drinking Water has the following response:

Section 2.11 and 6.1.4, Brine Disposal, did not provide sufficient information detailing the proposed brine disposal into the aquifer/s,

and did not provide sufficient information for the Office of Drinking Water to assess the potential impacts to drinking water using those aquifer/s as raw water source/s.

The proposal did not provide sufficient information detailing potential impacts to drinking water (regulated by The Drinking Water Safety Act and Regulations) via groundwater.

ODW.

(Notice: due to COVID, I will be working out-of-office, and expect potential delays in responses and processing times. Thanks.)

Cory Vitt, CMMA M.Eng. P.Eng.

(pronouns: they/them/he/him; please don't use "Mr. Vitt")

Approvals Engineer

Office of Drinking Water

Department of Conservation and Climate

1007 Century Street

Winnipeg, Manitoba R3H 0W4

Phone: 204-806-1363

Fax: 204-945-1365

Email: Cory.Vitt@gov.mb.ca

From: [Wiseman, Kylene \(CC\)](#)
To: [Winsor, Jennifer \(CC\)](#)
Subject: FW: Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00
Date: October 26, 2021 12:00:45 PM
Importance: High

Good morning Jennifer,

Upon review of the proposal, PADCOM is required to submit an application for a Water Rights Licence. Authorization from the Water Use Licensing Section, of the Drainage and Water Rights Licensing Branch, is required before any supply well exploration drilling activities begin.

Thank you,
Kylene Wiseman, P.Geol.

Drainage and Water Rights Licensing Branch
Conservation and Climate
Kylene.Wiseman@gov.mb.ca /

From: [Nicklin, Darren \(CC\)](#)
To: [Winsor, Jennifer \(CC\)](#)
Subject: RE: Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00
Date: October 27, 2021 8:37:11 AM

Any water control works would require a license or registration.

Water control works are defined as:

water control works" means any dyke, dam, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert borehole or contrivance for carrying or conducting water, that

- (a) temporarily or permanently alters or may alter the flow or level of water, including but not limited to water in a water body, by any means, including drainage, or
- (b) changes or may change the location or direction of flow of water, including but not limited to water in a water body, by any means, including drainage; (« ouvrages de régularisation des eaux »)

Darren Nicklin

Senior Water Resource Officer

Conservation and Climate

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Agriculture and Resource Development

Water Branch

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November 10, 2021

Jennifer Winsor

Senior Environmental Engineer, Environmental Approvals Branch

Manitoba Conservation and Climate

Jennifer.Winsor@gov.mb.ca

Dear Jennifer Winsor:

Thank you for the opportunity to review and provide comments on the Environment Act Proposal (EAP) provided by Potash and Agri Development Corporation of Manitoba Ltd. (PADCOM) associated with the Potash Solution Mining Project (File Number: 6126.00). Staff in the Water Quality Management Section (WQMS) reviewed the EAP and would like to offer the following comments and concerns from a surface water quality perspective.

The EAP prepared by PADCOM considers the Potash Solution Mining Project to have a negligible impact on surface water. However, few details are provided as to how the environmental impact assessment was determined. For example, environmental impact assessments require defined effects evaluation criteria (e.g., magnitude of effect, direction of effect, duration of effect, frequency, scope of effect, and reversibility) in order to establish the residual environmental impact. Unfortunately, the absence of such defined evaluation criteria from the EAP prepared by PADCOM limited the overall characterization of the impacts. In addition, few details were provided regarding the environmental risks to surface waters and mitigation measures in place to manage this risk.

PADCOM is proposing to build a surface water runoff collection system (comprised of perimeter trenches, a borrow pit, a process water pond, and a pumping system) in an effort to limit the release of contaminated water to the natural environment. Unfortunately, few specifications and engineering designs of the water collection system are provided. The WQMS recommends that PADCOM provide additional details regarding how the surface water will be captured, how much water will be stored in the pond, what type of intense rainfall event the collection system can withstand, and how this water will be recycled / reused within the processing facility. PADCOM suggests that the new innovative approach to potash mining will reduce the amount of water used and eliminates the need for a tailings pond/outdoor stockpiled product. However, the WQMS wonders if the water pond is essentially a small tailings pond. Figure 36, which provides a schematic of the site drainage plan, includes the locations where the drainage tiles, storage drain, and slurry walls are to be installed; however, does not describe where the pond will be positioned and how the pond will be constructed (e.g., slope, materials). PADCOM's proposal suggests that any contamination issues in the pond will be dealt with by diluting with more freshwater runoff. However, for many contaminants (e.g., bioaccumulative metals), dilution is not the solution.

The WQMS would be concerned if contaminated surface runoff from the property (or pond) is released to the natural environment during snowmelt or intense rainfall events. It is understood

that the pond will be pumped down to minimum levels to accommodate surface runoff from the site. However, the EAP states that during an extreme rainfall event, surface runoff will be handled by allowing the excess flow to bypass the pond. The WQMS is concerned that bypassing the system could result in the discharge of deleterious substances to the natural environment. Although there are no lakes, rivers, and streams located within the project site, there are fish bearing waterbodies nearby (e.g., Assiniboine River located ~1.5 km east) that is anticipated to receive surface runoff from the project site. It is recommended that PADCOM provide additional details as to what this bypass system entails and where the water will be pumped to if the pond is too full to control the amount of surface runoff and the plant is unable to cope with additional water. The WQMS recommends that PADCOM regularly monitor and inspect the water collection system to ensure it is working efficiently and that deleterious substances (e.g., nutrients, ionic constituents such as magnesium, potassium, and chloride) are not being discharged off the property. Staff in the WQMS would be concerned if water quality in the Assiniboine River (or further downstream) were to deteriorate (e.g., increased salinity, increased nutrient loading) as a result of the proposed project.

Sincerely,

Andrew Burton
Senior Water Quality Specialist

c: Brian Wiebe, Manitoba Agriculture & Resource Development, Brian.Wiebe2@gov.mb.ca;
Kelly-Anne Richmond, Manitoba Agriculture & Resource Development, Kelly-Anne.Richmond@gov.mb.ca;

DATE: November 9, 2021

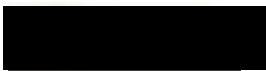
TO: Jennifer Winsor, P.Eng.
Senior Environmental Engineer,
Environmental Approvals Branch
MB Conservation and Climate
1007 Century Street,
Winnipeg, MB R3H 0W4
Ph: 204-945-7012

FROM: Allison Krause Danielsen
Regional Wildlife Biologist
Wildlife and Fisheries Branch
1129 Queens Avenue
Brandon MB R7A 1L9
PHONE: (204) 726-6450

SUBJECT: Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00

Here are my comments on behalf of Wildlife for the EAP for the Potash Mine

1. A search of the Conservation Data Center Biotics Database should be requested by proponent for the project area. Ground-based surveys for rare species and species listed under ESEA and federally listed Species at Risk may be required for mine site, well sites, and pipelines routes intersecting or within applicable setback distances of suitable habitat. If rare and/or endangered species are located nearby, mitigations may be required.
 - a. Usually a thorough EAP details nearby ecosystems. Some plants and wildlife, notably birds, are sensitive to different types of development, including construction activities and new infrastructure. As a consequence of this, the Manitoba Conservation Data Centre have developed setback distances for different types of developments. See attached document for development setbacks and timing.
2. The project area is located in a region that has game species (moose, deer, elk) which are important for rights-based and licenced hunters, as well as many at-risk bird species (Sprague's pipit and Chestnut-collared Longspur) just south of the site. Even a small development can have impacts on local wildlife (such as disruption to songbird breeding). A more thorough listing of wildlife in the area, as well as mitigation measures, should be included in the wildlife section. It is unacceptable to say that there is "no evidence that this area is home to wildlife" without providing evidence that due diligence has been done.
3. The EAP makes reference to well sites and pipelines that will be required for mine operations. These sites should be identified and a wildlife/habitat assessment should be completed and included in the Wildlife section of the EAP. If proposed well sites and pipeline routes have not yet been identified, there should be a required commitment to conduct an EAP as it is relevant to the environmental footprint of the mine.



[Allison Krause Danielsen]

Attachment(s): CDC Development set-backs

c. David Elliott

Recommended Development Setback Distances from Birds
Manitoba Conservation Data Centre
June 24, 2015

Introduction

The Manitoba Conservation Data Centre (MBCDC) developed these recommendations and setback distances in order to provide industry proponents with consistent, readily available guidelines that can be applied in situations where sensitive species may be present in or near the project area. The setback distances were established by reviewing relevant literature and guidelines from other jurisdictions, and consulting local ornithologists.

General Recommendations

In most cases, disturbance or potentially deleterious activity outside of the breeding season is preferential to activity during the breeding season. The breeding season begins with territory establishment and ends when the young are fledged and the nesting territory is abandoned.

Where the activity will occur in suitable habitat for these species (eg: native grassland for the grassland birds), minimal clearing/disturbance techniques should be employed during or even outside of the breeding season. Any suitable habitat unavoidably disturbed should be reclaimed/rehabilitated as soon as possible.

If these species have been recorded in or near the project area, it is recommended that the proponent develop an environmental protection plan to submit to the MBCDC for review. At minimum the plan should:

- a) describe the project, including a timeline of activities, a description of the location and current land use, and a description of the wildlife values in the area, including any species of concern identified by the MBCDC;
- b) identify potential impacts of the project to wildlife values, especially to any species of concern identified by the MBCDC; and
- c) propose impact management and mitigation measures to avoid or manage the identified impacts, including reclamation/rehabilitation efforts.

In some cases, MBCDC may also recommend the development of a monitoring program designed to assess species of concern that may occur in the area, impacts on wildlife values and/or the effectiveness of mitigation measures.

Disturbance Categories

Low

e.g.: foot traffic; occasional/infrequent/short-term small vehicle (<1 ton) or ATV use; operating oil or gas wells without flaring; operating pipelines

Foot-traffic only (FTO) is indicated for certain taxa, in which case all activities normally considered low disturbance (other than foot traffic) are considered medium disturbance.

Medium

e.g.: trucks > 1 ton (gravel, oil, grain), regular/frequent/long-term small vehicle (< 1 ton) or ATV use, pipeline construction (diameters < 1 foot), operating compressor station or battery without flaring

High

e.g., road construction, roads, drilling rigs, mines and quarries, construction of compressor station or battery, forest harvest, large diameter pipeline construction, seismic exploration, blasting, rock crushing, asphalt batching, gravel pit, operating compressor station or battery or oil/gas well with flaring

Nest Site

In many cases it will be difficult to identify the exact location of a nest, and intensive efforts to do so may disturb breeding birds and/or their nests. In such cases, determining the main home range, territory and/or song perches through auditory song/call surveys and low-intensity visual observation, are recommended to determine the approximate location of nest sites. The set-back distance should then be applied to this approximate location.

Species	Key Wildlife Feature	Restricted Activity Period	Recommended Set-back Distance by Disturbance Category (metres)		
			Low	Medium	High
Baird's Sparrow	Nest Site	May 15 - August 15	100	250	500
Bald Eagle	Active or Traditional Nest Site	March 15 - July 15	250	500	1000
Bank Swallow	Nesting Colony	May 15 - July 31	50	150	300
Barn Swallow	Nest Site	May 15 - September 30	50	100	100
Barred Owl	Active or Traditional Nest Site	March 15 - July 15	250	500	1000
Bobolink	Nest Site	May 15 - August 15	100	250	400
Boreal Owl	Nest Site	March 1 - July 15	250	500	1000
Buff-breasted Sandpiper	Migratory Stop-over Site	May 20 - June 5, July 20 - Oct 10	100	200	400
Burrowing Owl	Active or Traditional Nest Site	April 1 - August 15	200	300	500
		August 16 - March 31	50	250	500
Canada Warbler	Nest Site	May 1 - July 31	200	300	450
Chesnut-collared Longspur	Nest Site	May 1 - August 15	100	250	650
Chimney Swift	Nest or Roost Site	May 1 - July 31	50	150	300
Common Nighthawk	Nest Site	May 1 - August 31	100	200	300
Eastern Screech Owl	Nest Site	March 15 - July 15	200	300	500
Eastern Wood-Pewee	Nest Site	May 15 - Aug 15	50	150	300
Ferruginous Hawk	Active or Traditional Nest Site	March 15 - July 31	500	750	1000
Golden-winged Warbler	Nest Site	May 15 - August 6	200	300	450
Golden Eagle	Active or Traditional Nest Site	March 15 - July 15	500	750	1000
Grasshopper Sparrow	Nest Site	May 16 - August 21	100	250	650
Great Gray Owl	Active or Traditional Nest Site	Feb 15 - July 15	250	500	1000
Horned Grebe	Nest Site	May 1 - Sep 15	100	200	400
Least Bittern	Nest Site	May 1 - July 31	100	200	400
Loggerhead Shrike	Nest Site	May 1 - August 15	100	250	500
Northern Hawk Owl	Nest Site	Feb 15 - July 15	250	500	1000
Olive-sided Flycatcher	Nest Site	May 1 - August 31	50	150	300
Peregrine Falcon ¹	Nest Site	April 1 - August 15	250	500	1000
Piping Plover	Active or Traditional Nest Site	April 15 - August 15	200	400	600
Red-headed Woodpecker	Nest Site	April 15 - August 15	50	100	200
Red Knot	Migratory Stop-over Site	May 20 - June 5, July 20 - Oct 10	100	200	400
Ross's Gull	Nest Site	May 15 - August 15	500	1000	1500
Rusty Blackbird	Nest Site	May 1 - July 31	50	150	300
Sharp-tailed Grouse ²	Lek	Mar 15 - May 15	200	500	1000
Short-eared Owl	Nest Site	April 15 - September 15	200	300	500
Sprague's Pipit	Nest Site	May 1 - August 15	100	250	650
Trumpeter Swan	Nest Site	April 1 - July 31	500	750	1000
Eastern Whip-poor-will	Nest Site	May 15 - July 16	100	200	300
Whooping Crane	Staging Area	May 1 - November 1	500	750	1000
Yellow Rail	Nest Site	May 1 - July 15	100	150	350
American White Pelican	Nesting Colony	April 1 - August 31	500	750	1000
Double-crested Cormorant	Nesting Colony	April 1 - August 31	400	500	750
Herons	Nesting Colony	April 1 - August 31	400	500	750
Colonial Nesting grebes	Nesting Colony	May 15 - July 15	100	200	400
Colonial Nesting gulls/terns	Nesting Colony	May 1 - July 15	400	500	750

¹Non-urban occurrences only

²Low disturbance is foot traffic only.

From: [Porteous, Marianne \(ARD\)](#)
To: [Winsor, Jennifer \(CC\)](#)
Subject: RE: Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00
Date: November 3, 2021 12:55:44 PM

Hello,

No concerns from the Forestry and Peatlands Branch.

Marianne

From: [+WPG969 - MIT Environmental Services Section \(MI\)](#)
To: [Winsor, Jennifer \(CC\)](#)
Subject: RE: Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00
Date: November 12, 2021 9:07:40 AM

Good morning,

The following MI branches have no concern:

- Roadside Development
- Western Regional Operations
- Water Management, Planning and Standards

Thank you very much for the opportunity to review and comment.

Grace Ruth S. Quintana, M.Sc.

Environmental Review Coordinator

Environmental Services and Consultation

Manitoba Infrastructure

15th Flr 215 Garry Street

Winnipeg, MB R3C 3P3

Grace.Quintana@gov.mb.ca

From: [Kelly, Jason \(CC\)](#)
To: [Steppan, Dan \(FIN\)](#); [Winsor, Jennifer \(CC\)](#); [Elliott, David \(ARD\)](#); [Janusz, Lauren R \(ARD\)](#); [Porteous, Marianne \(ARD\)](#); [Conrod, Matt \(ARD\)](#); [Frias, Winifred \(ARD\)](#); [Richmond, Kelly-Anne \(ARD\)](#); [Kopytko, Myles \(ARD\)](#); [Phipps, Graham \(ARD\)](#); [+WPG1195 - Mines BR \(ARD\)](#); [Kennedy, Tafa \(ARD\)](#); [+WPG1195 - Petroleum \(ARD\)](#); [Molod, Rommel \(CC\)](#); [Harman, Kristal \(CC\)](#); [Hawryliuk, Yvonne \(CC\)](#); [+WPG530 - Drinking Water - Environmental \(CC\)](#); [Hay, David \(CC\)](#); [Cunningham, Neil \(CC\)](#); [+WPG574 - HRB Archaeology \(SCH\)](#); [Forrestall, Kristy \(CC\)](#); [+BRA993 - Brandon CRP \(MR\)](#); [Roberecki, Susan \(HSAL\)](#); [Sturgess, Yvonne \(HSAL\)](#); [+WPG969 - MIT Environmental Services Section \(MI\)](#); iaac.pnr-rpn.aeic@canada.ca
Cc: [Beshada, Eshetu \(CC\)](#)
Subject: RE: Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00
Date: October 28, 2021 8:32:21 AM

Parks has no comments or concerns.

From: [Leonen, Leonardo \(ARD\)](#)
To: [Winsor, Jennifer \(CC\)](#)
Cc: [Mraz, Peter \(ARD\)](#); [Williams, Lisa \(ARD\)](#)
Subject: FW: Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00
Date: November 4, 2021 4:13:59 PM
Importance: High

Good afternoon Jennifer,

There are no known Petroleum Deposits or infrastructure in the area and therefore Petroleum has no concerns.

Regards,

Leo

DATE: November 17, 2021

TO: Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century Street
Winnipeg MB R3H 0W4
Ph: 204-945-8321
Email: Jennifer.Winsor@gov.mb.ca

FROM: Nicole Lavallee, Environment Officer
Manitoba Conservation and Climate
308, 27 2nd Avenue SW
Dauphin MB R7N 3E5
Phone: (204) 648-3145
Email : Nicole.Lavallee@gov.mb.ca

SUBJECT: Environment Act Proposal – PADCOM – Potash Mine and Processing
Facility

File: 6126.00

Manitoba Conservation and Climate's Environmental Compliance and Enforcement Branch reviewed the above proposal and has the following questions and comments:

- Section 2.9.4 mentions the use and storage of 'light crude'. This may fall into under the Storage and Handling of Petroleum and Allied Petroleum Products Regulation MR 188.2001. Further clarification is required to determine if this product is subject to the regulation.
- Section 6.1.1 proposes the use of a 10,000 litre sewage holding tank that will be truck hauled to the Russell wastewater treatment lagoon. Please clarify the type and estimated volume of wastewater to be hauled there. Environmental Compliance and Enforcement branch has received an Application to Register a 2000 gallon holding tank to service the office building.

Winsor, Jennifer (CC)

Subject: FW: Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00

From: Kopytko, Myles (ARD) <Myles.Kopytko@gov.mb.ca>

Sent: November 18, 2021 1:52 PM

To: Winsor, Jennifer (CC) <Jennifer.Winsor@gov.mb.ca>

Subject: RE: Environment Act Proposal for TAC Review - PADCOM - Potash Mine and Processing Facility - File 6126.00

Location of Potash Mine headquarters has no impacts to Crown Land under the Crown lands Act.

Area of interest is expressed to be generally Township 19,20, and 21 in the proposal

There are a few crown land parcels dispersed along those townships. It appears from the report that the general activity would be subsurface, although that is not clear. For any occupation to occur on the land, an application to crown land tenure will be required, for any work activity to occur on Crown land under the Crown Lands Act will require a Crown Lands Permit.

Myles Kopytko

Lands Branch, Ecosystems Management Division

Agriculture and Resource Development

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