



# MANITOBA ECO-NETWORK

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Honourable Mike Moyes  
Minister of Environment and Climate Change

Director Agnes Wittmann  
Environmental Approval Branch,  
Environment and Climate Change

Manitoba Public Registry

December 1, 2025

## **Re: File No. 6275.00 - Sio Silica, Simba Sand Extraction Project**

These comments are on behalf of the Manitoba Eco-Network (MbEN), in response to the Environment Act Proposal (EAP) for the Sio Silica Corporation's proposed Simba Sand Extraction Project (formerly known as the Vivian Sand Extraction Project), [Public Registry File No. 6275](#).

Over the past five years, MbEN has been working to support concerned community members from the RM of Springfield and the surrounding area who are concerned about the potentially irreversible impacts to the environment and human health that Sio Silica's proposed silica sand extraction activities could cause in the area. This included a public Clean Environment Commission (CEC) hearing, with no participant funding, at which community members were still able to make their opposition to the potential impacts of this project clear. The [CEC agreed](#) that this project should not proceed.

We are extremely troubled that in the twenty months since Sio Silica's application for their sand extraction project was first rejected, the applicant has not made meaningful progress on any of the recommendations made by the CEC. As we detail in Appendix A, in MbEN's view, all of the CEC recommendations for Sio Silica's project remain incomplete or inadequately addressed.

These failures to produce credible data and address the risks already identified through Manitoba's impact assessment process is a major red flag and an indication that this project is not being developed with the best interests of Manitobans in mind. We agree with Premier Wab Kinew that Manitoba's resources should be developed "with higher environmental standards, higher respect for human rights, and higher labour standards than any other jurisdiction in the world."

**As a result, our primary recommendation is that the proposed Simba Silica Extraction Project be rejected now, without wasting more taxpayer time and money to re-review a project that remains substantially the same, including the potential for irreversible harm to the Winnipeg Sandstone and Red River Carbonate aquifers.**

However, if this project is allowed to continue through the impact assessment and licensing process under *The Environment Act*, the Minister/Director should take the following actions:

- 1) Designate the Simba Silica Sand Project as a Class 3 development** due to the potential significant and irreversible harm to the drinking water source of 100,000 Manitobans. A Class 3 designation will also ensure the Minister is the decision-maker for the impact assessment and licensing process.
- 2) Require Sio Silica to produce and publicly publish a cumulative effects assessment report** before proceeding any further in the licensing process.
- 3) Require Sio Silica to produce and publicly publish all missing management and mitigation plans**, including their plans for post-approval practices (monitoring, follow-up and adaptive

management) and emergencies in the public registry so they can be independently reviewed prior to the licensing decision.

**4) Request the Minister direct the Clean Environment Commission (CEC) to hold a public hearing to review Project Simba, with full participant funding.**

As noted by Premier Wab Kinew when the government said “No to Sio” the first time in February 2024: "In order for Manitobans to be healthy now and for generations into the future, we have to protect a clean, safe and healthy environment."

MbEN suggests that the best way to accomplish this high standard of protection is to reject Sio Silica’s application now. However, if the decision is made to allow this project to move forward through licensing process, it needs to be subject to a robust impact assessment process to ensure the full scope of concerns and potential impacts are properly understood before irreversible harm occurs to the Winnipeg Sandstone and Red River Carbonate aquifers.

The two CEC recommendations for government action are also incomplete. The government will need to address these recommendations for a meaningful IA process to occur.

**Major Concerns with Project Simba**

MbEN and the community members it has been working alongside have identified many reasons for the Department of Environment and Climate Change to reject Sio Silica’s sand extraction project proposal for the second time. This section highlights the biggest concerns we have with the EAP for Project Simba.

**1) *No Amount of Drilling is Safe***

The precautionary principle dictates that the licence for this project should be denied. This project poses irreversible risks to the only available fresh water source for the area, jeopardizing the health of Manitobans for generations to come. Therefore, it should not receive an Environment Act Licence. The risk is too great.

Instead of producing credible data and meaningfully addressing the concerns of the CEC, Sio Silica’s response has been to limit the scope of the EAP to only the first four years of operations of a project that is intended to last for 24 years. This is an insult to the Manitobans who this project could detrimentally impact and fails to address the scientific reality that reducing the number of wells from a maximum of 467 per year, to a maximum of 167 wells per year, with 25 in the first year, does not eliminate the irreversible risks that this project poses.

During the previous CEC hearings MbEN/OLS hired Louis-Charles Boutin, P. Eng. from Matrix Solutions Inc. as an independent expert in groundwater and numerical modelling. During the hearing he illustrated that the 6,735 m<sup>3</sup> of volume disturbance from a single well was comparable to an area that is three city buses long (35 metres) and just shy of two city buses high (21 metres). He highlighted that from a geotechnical perspective, the collapse of the shale and collapse of the seven feet or limestone are both irreversible project effects, this mixing of the two aquifers is irreversible, and each single bore hole created a pathway and created risk of this irreversible damage that cannot be mitigated.

The findings of Matrix were supported by other experts hired as part of the CEC hearing, including the experts retained by the CEC. This undoubtedly impacted the Minister’s decision not to grant a licence the first time around. As we argued in [MbEN/OLS Closing argument](#), supported by our experts, the importance of preserving the hydraulic isolation between aquifers is paramount in a precautionary

approach. Precaution is required for this untested and uncertain technology since the risks are irreversible and threaten the water source of nearly one in ten Manitobans. As the former Minister of Environment and Climate Change stated the proposed silica extraction process is “a completely novel way of mining silica sand. It has never been done anywhere in the world, drilling through [two] aquifers to extract that resource is simply too novel, too risky.” As a result, MbEN still thinks this project should not proceed.

It is also very concerning that Sio Silica intends to deal with the expansion of activities in years 5 through 24 through the Licence Alteration process under s 14 of *The Environment Act*. This reliance on future licence alterations likely means no public participation and no public accountability as the majority of licence alterations are deemed “minor” by the Department, so they are only required to provide public notice once a licence alteration and project changes have already been approved.

The EAP and impact assessment (IA) process should analyze the entire lifecycle of the project, including future planned expansions. Splitting the project and limiting the scope of the EAP accordingly is an attempt by Sio Silica to manipulate the regulatory process. It is an attempt to defeat the purpose of *The Environment Act* and the core principles of Manitoba’s IA process.

Drilling fewer wells does not change the novelty of the drilling process. Every well drilled threatens the drinking water of nearly one in ten Manitobans. Drilling less wells in the first few years, with the same plans to ramp up operations in the long-term, does not meaningfully alter the fact that it is simply too risky to gamble with Manitobans’ pristine drinking water.

**MbEN Recommendation:** Reject the proposed Simba Silica Extraction Project now, without wasting more taxpayer time and money to re-review a project that remains substantially the same, including the potential for irreversible harm to the Winnipeg Sandstone and Red River Carbonate aquifers.

## **2) *The Potential for Irreversible Harm Is Not Being Taken Seriously***

If Project Simba proceeds through the IA process, the Department needs to do something different this time, it cannot expect the same process to have a different outcome. MbEN and our partner organizations PILC and the University of Winnipeg recently completed a law reform project, [\*Empowering Impact Assessment\*](#), that was focused on identifying community priorities for impact assessment reform and gathering public insights on Manitoba’s current IA process under *The Environment Act*. Overall, we found that Manitoba’s provincial IA process is outdated and in need of significant reform. We also heard clearly from Manitobans that they expect the protection of people and the environment through a robust provincial IA process, which incorporates meaningful public engagement and fosters trust.

One pathway to strengthen Manitoba’s IA process could be to amend the *Classes of Development Regulation* to ensure projects with significant potential impacts, particularly when irreversible harm to public drinking water sources is involved, can trigger an appropriate level of scrutiny from government regulators and the public during the IA process. Under *The Environment Act*, it appears that Class 3 developments are supposed to include those with the most potential for significant impacts. Thus, Project Simba (and similar future projects) with potential to irreversibly harm a significant source of drinking water for local community members should be classified as a Class 3 development.

**MbEN Recommendation:** Designate the Simba Silica Sand Project as a Class 3 development due to the potential significant and irreversible harm to the drinking water source of 100,000 Manitobans. A Class 3 designation will also ensure the Minister is the decision-maker for the impact assessment and licensing process.

### **3) Failure to Undertake a Cumulative Effects Assessment**

The CEC recommended Sio Silica undertake “[a] cumulative effects assessment for the full 24-year life of the project be carried out and its impact be considered in light of other existing and foreseeable projects in the area.” (CEC Report, 85). Sio Silica has disregarded this CEC recommendation, stating in the EAP that this is not a requirement under the current *Environment Act Proposal Guidelines*. Sio Silica advanced these same arguments during the CEC hearing for the previous version of this project. However, the CEC noted that “guidelines are just that – guidelines” and that “going beyond the minimum will provide the regulator with greater confidence.”

During the CEC hearing, MbEN and Our Line in the Sand highlighted in a [joint submission](#) that the Department of Environment and Climate change has the authority under *The Environment Act* to require a proponent to undertake a cumulative effects assessment. We recommend the government exercise this power and require Sio Silica to undertake a CEA and publish the report in the public registry, before they are allowed to proceed any further in the IA process.

**MbEN Recommendation:** Require Sio Silica to produce and publicly publish a cumulative effects assessment report before proceeding any further in the IA and licensing process.

### **4) Failure to Publish Proposed Management and Mitigation Plans**

The CEC’s recommendation #4 was that Sio Silica should complete and distribute ten individual management/mitigation plans for public review, but Sio Silica has only included three of these ten plans in its updated EAP, leaving 70% of its responsibilities unfulfilled in this regard. Sio Silica has indicated that the “others will be prepared prior to commencing project activities.” (EAP 2025)

The CEC clearly recommended that all plans be available for public review. By not including seven of the ten plans identified by the CEC, the proponent is shielding these plans from meaningful public engagement and review by the Technical Advisory Committee (TAC), which tends to assess the EAP at the around the same time as the public comment period.

**MbEN Recommendation:** Require Sio Silica to produce and publicly publish all missing management and mitigation plans, including plans for post-approval practices (monitoring, follow-up and adaptive management) and emergencies, in the public registry so they can be independently reviewed by the public and the TAC prior to the licensing decision.

### **Public Access to Information**

The concerns of local community members and the organizations who have dedicated much time and effort to highlighting the detrimental impacts that will be caused if this project is allowed to proceed, which include the high potential to incur devastating and irreversible harms to local groundwater sources, have not yet been alleviated in the new EAP. Thus, the previously shared insights and recommendations of the public associated with Sio Silica’s proposed silica sand activities

from the following public registry files should be directly linked within File No. 6275 and be considered by decision-makers during the current process:

- File No. [6057.00](#) – Sio Silica Corporation, Vivian Sand Processing Facility
- File No. [6119.00](#) – Sio Silica Corporation, Silica Sand Extraction Project

The evidence and recommendations produced through the Clean Environment Commission hearing for the earlier version of this project Sio Silica tried to get licenced should also be a directly linked resource in the Registry File No. 6275.

This is important information for the public to have access to and for the Department to consider. It also seems worth highlighting that Appendix B – Hydrogeological Assessment Report was not posted to the public registry file no. 6275 until November 21, 2025. This means the public has only had a little over one-week to review this part of the EAP. This is not acceptable. It once again points to the fact that the proponent is not submitting a complete or adequate EAP, and it provides a further rationale for once again refusing to grant this proposal a licence, or at the minimum it warrants a further extension to the comments deadline.

### **Corporate Entitlement and Regulatory Capture**

Despite Sio Silica’s efforts to change their corporate name and the name of their silica sand project multiple times, and successful attempts to separate the directly connected project elements into multiple different impact assessment and licensing processes, their proposed long-term plans remain substantially the same in intent and potential impact as those originally proposed five years ago, and should not be allowed to proceed.

For some reason, this Alberta-based corporation appears to feel entitled to Manitoba’s natural resources and thinks that the economic advancement of a few should outweigh the importance of environmental protection and human health for a significant portion of Manitoba’s population who relies on local groundwater sources for drinking water and other important uses. As noted by the former Minister of Environment and Climate Change when the project was initially rejected: “No one knows what the long-term effects of this proposal would be, and frankly the worst-case scenarios would be absolutely devastating as nearly 100,000 Manitobans source their drinking water from these aquifers.”

The Simba Project EAP has done nothing to alleviate these concerns. As discussed above, there appears to have been no advances made in the corporation’s research, no new technological developments that will make the novel extraction process safer, and no guarantees or concrete plans for how Sio Silica will be held liable if irreparable harm to the Winnipeg Sandstone and Red River Carbonate aquifers occurs. Water is life, water is priceless.

Instead, Sio Silica seems to be trying to gaslight the Government and the Public into thinking the reduction in initial well sites somehow changes the fact that the proposed extraction process remains the same and the expert evidence submitted at the CEC hearing showed this same drilling process had already caused damage.

As Premier Kinew told *The Narwhal* when the project was rejected the first time: “The business case of this project does not outweigh the serious environmental risk this project poses and the impact it could have on the drinking water of this community and many others in the region.”

As we have already stated, this licence should simply be refused. However, if Project Simba is allowed to proceed, it is necessary for the Department to require all missing information from the EAP and the Minister request a full public CEC hearing be held, with participant funding, since this is a project of

significant public interest. Given that this would be the second time Manitobans have been forced to take on the burden of a public hearing since Sio Silica is once again refusing to do more than the bare minimum, it should be the Proponent, not the people of Manitoba, that should foot the bill.

**MbEN Recommendation:** If Project Simba is allowed to continue through the impact assessment and licensing process under *The Environment Act*, the Minister of Environment and Climate change should Request the Minister direct the Clean Environment Commission (CEC) to hold a public hearing to review Project Simba, with full participant funding.

**Conclusion**

The Government of Manitoba and the Department of Environment and Climate Change have an opportunity to send a clear message to the increasing number of developers who want to exploit our precious natural resources. They can send the message that health and safety of many Manitobans should be prioritized over the economic benefit of a few. When it comes to clean drinking water – one of the most precious resources in the world – the focus should be on protecting people and the planet first.

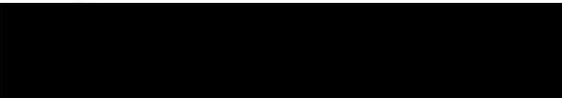
If the Government of Manitoba is truly “trying to make friendly Manitoba, environmentally friendly Manitoba”, as suggested by Premier Wab Kinew at the Pathway to Net Zero Press Conference in October 2025, there is a lot more work to be done. This includes utilizing the existing powers of decision-makers under *The Environment Act* to require a robust IA process and meaningful public engagement for all proposed developments, including Project Simba.

MbEN appreciates your consideration of our comments about the environmental assessment and licensing of Sio Silica’s proposed silica sand extraction project. 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 Environment and Climate Change 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 will be made.

Sincerely,  
Heather Fast, J.D., LL.M., Policy Advocacy Director



James Beddome, LL.B., Executive Director



***About Manitoba Eco-Network:***

*The Manitoba Eco-Network is a non-profit registered charity which seeks to strengthen Manitoba’s environmental community with the goal of protecting our environment for the benefit of current and future generations. We serve as an umbrella for environmental non-governmental organizations across the province. Our mission is to promote good environmental governance, support and build capacity, advocate for environmental justice, and act as a bridge between environmental organizations, the public, and all levels of government.*

## Appendix A - Incomplete and Inadequately Addressed CEC Recommendations

CEC Recommendation	Proposed Project Revision(s) by Sio Silica (EAP 2025)	MbEN Response	Summary
<p><b>(#1)</b> The government seek a legal opinion with respect to sections 2(e) and 3(1) of the <i>Well Standards Regulation</i> under <i>The Groundwater and Water Well Act</i> and section 6(1) of the <i>Drilling Regulation</i> under <i>The Mines and Minerals Act</i>, regarding the interconnection between the Winnipeg Formation and any overlying aquifer, including aquifers within the Stonewall, Stony Mountain or Red River Formations.</p>	<p>N/A</p>	<p><i>There is no indication that the government has sought or obtained this legal opinion.</i></p> <p><i>Without this legal opinion many of the questions that MbEN/OLS raised during the CEC hearing remain unanswered.</i></p> <p><i>The assessment cannot and should not proceed without this legal opinion being obtained and publicized.</i></p> <p><i>Although this is ultimately a government responsibility, we submit that most proponents would do more than the minimum, and would enquire with the government with respect to the status of this legal opinion before submitting their EAP, and would report on it in the EAP accordingly.</i></p>	<p>Incomplete</p>
<p><b>(#2)</b> If work on this project continues, it should be done on a step-wise basis to improve the level of confidence that no significant adverse effects will occur to impair the quality and quantity of water available from the affected aquifers.</p> <p>While the commission defers to the expertise of qualified professionals to design a detailed step-wise program, the following considerations should be taken into account: [see 2.i-2.iv below]</p>	<p>“Sio has heard the feedback from the public and the province on its original Environment Act Proposal (EAP) the previously proposed Vivian Sand Extraction Project (AECOM 2021). Sio is submitting this new EAP for review for a revised Project which describes a stepwise phased approach that substantially reduces the extracted sand volumes for the first five years of the Project.”</p>	<p><i>The risks to groundwater still remain and the proponents plan fails to improve the level of confidence that no significant adverse effects will occur to impair the quality and quantity of water available from the affected aquifers.</i></p> <p><i>We acknowledge that Sio Silica’s updated application indicates they will be proceeding with a “step-wise phased approach” that involves drilling less wells and extracting less sand in the first-five years, but we submit the risks still remain, these risks are irreversible, and so simply reducing the number of wells drilled in the first few years does not adequate address the risks.</i></p> <p><i>Sio Silica still intends to use the same novel extraction method that was shown in the CEC hearings to risk destroying important barriers between separate aquifers, potentially creating sinkholes at the surface, and increasing the risk of contaminants entering the ground</i></p>	<p>Inadequate</p>

		<p><i>water.</i></p> <p><i>Drilling less holes does not eliminate these risks, as a single well could destroy the barriers between aquifers and/or contaminate groundwater. This could lead to irreversible damage that cannot be mitigated that would threaten the only freshwater source for the area.</i></p>	
<p><b>(#2.i)</b> As a general principle, full-scale production should only proceed if and when the body of scientific and engineering evidence confirms that the risks are adequately understood and manageable.</p>	<p>“Sio will initiate the first year of operations at a location that allows for a reduced number of wells in a cluster, some as small as one or two wells, but with no more than five wells per cluster. Sio will start sand extraction activities using a stepwise phased approach that includes initiating a limited number of well clusters with a small number of wells. During the initial phase of Project operations, Project design assumptions and geotechnical and geological modeling (Appendix C) will be confirmed by monitoring. The number of well clusters and wells will gradually be increased if monitoring data and associated reporting results verify that this can be done without risk of significant adverse effects during the initial small-scale operations. Based on on-going monitoring results, minor adjustments to the Project design may be done during the initial phase of operations (e.g., number of wells and spacing of wells within each well cluster, and spacing of each well cluster). Should monitoring results yield requirements for Project operation parameter changes, Sio will advise the EAB of Project operation changes in accordance with provisions in an Environment Act Licence (EAL) for the Project.”</p>	<p><i>As the CEC recommended the risks need to be adequately understood and manageable first.</i></p> <p><i>We submit that these risks are not understood or manageable and that a single well could potentially destroy the barriers between aquifers and/or contaminate groundwater.</i></p> <p><i>In accordance with the precautionary approach these risks should be understood before drilling any wells.</i></p>	<p>Inadequate</p>
<p><b>(#2.ii)</b> The proponent must add to the body of evidence relating to the possible heterogeneity of the geological structures in the production area so that the risks of subsidence and propagation and impact of extraction voids over time are defined to a higher level of</p>	<p>“Sio will conduct geotechnical, hydrogeological and geochemistry assessments/installations for monitoring and sampling in accordance with an EAL for the Project. Geotechnical investigations are proposed to include: - Angled bore-hole testing to verify presence of vertical fractures - Acoustic Televiwer/Optical Televiwer (ATV/OTV) surveys - Coring to confirm overburden, and competent caprock thickness - Side</p>	<p><i>The geotechnical , hydrogeological and geochemistry assessments need to be done as part of the IA process and before, not after a licence is granted as the proponent is proposing.</i></p> <p><i>Promising to do the assessment later as part of a licence condition does not lead to a higher level of confidence.</i></p>	<p>Inadequate</p>

<p>confidence. This must include inclined drilling in order to determine if vertical fractures exist in the limestone that could affect the stability of the layer.</p>	<p>scan sonar to confirm cavity development and long-term cavity shape”</p>	<p><i>It is not acceptable to use an environmental licence to obtain baseline data.</i></p>	
<p><b>(#2.iii)</b> The proponent must carry out full-scale well-cluster extraction tests in order to provide information on the potential effects of extracting the planned 21,000 tonnes of sand from a single cluster. This should be completed from several clusters in different parts of the project area. During extraction tests, cavities must be monitored to determine their likely long- term shape and size and establish whether they are likely to continue to grow over time. A representative number of cavities reflecting the potential variability of geological conditions should be monitored to indicate that the cavities have remained stable over time.</p>	<p>“Sio will initiate the first year of operations at a location that allows for a reduced number of wells in a cluster, some as small as one or two wells, but with no more than five wells per cluster. Sio will start sand extraction activities using a stepwise phased approach that includes initiating a limited number of well clusters with a small number of wells. During the initial phase of Project operations, Project design assumptions and geotechnical and geological modeling (Appendix C) will be confirmed by monitoring. The number of well clusters and wells will gradually be increased if monitoring data and associated reporting results verify that this can be done without risk of significant adverse effects during the initial small-scale operations. Based on on-going monitoring results, minor adjustments to the Project design may be done during the initial phase of operations (e.g., number of wells and spacing of wells within each well cluster, and spacing of each well cluster). Should monitoring results yield requirements for Project operation parameter changes, Sio will advise the Environmental Approvals Branch (EAB) of Project operation changes in accordance with provisions in an EAL for the Project.”</p>	<p><i>Again, the information should be available as part of the IA process.</i></p> <p><i>It is not acceptable to use an environmental licence to obtain baseline data.</i></p>	<p>Inadequate</p>
<p><b>(#2.iv)</b> During extraction tests, cavities must be monitored to determine their likely long- term shape and size and establish whether they are likely to continue to grow over time. A representative number of cavities reflecting the potential variability of geological conditions should be monitored to indicate that the cavities have</p>	<p>“Sio will conduct geotechnical, hydrogeological and geochemistry assessments/installations for monitoring and sampling in accordance with an EAL for the Project. Geotechnical investigations are proposed to include: - Angled bore-hole testing to verify presence of vertical fractures - Acoustic Televiwer/Optical Televiwer (ATV/OTV) surveys - Coring to confirm overburden, and competent caprock thickness - Side scan sonar to confirm cavity development and long-term cavity shape.”</p>	<p><i>Again, the information should be available as part of the IA process.</i></p> <p><i>It is not acceptable to use an environmental licence to obtain baseline data.</i></p>	<p>Inadequate</p>

remained stable over time.			
<p><b>(#3)</b> The minister appoint a project monitoring committee with membership from municipal and provincial government departments to receive and assess relevant information as the proponent undertakes step-wise development. This should include member(s) of the affected municipal government(s), senior leadership from Environment and Climate, and technical experts from the government related to mining, groundwater and environmental licensing and enforcement. The committee should be provided with additional resources and technical expertise as required. The guiding principles for the monitoring process should include: i) sharing of scientific and engineering findings between the proponent and the monitoring committee; ii) regular, defined reporting requirements by the proponent to the monitoring committee, and; iii) regular, defined reporting jointly by the monitoring committee and the proponent to the public</p>	<p>“Sio is receptive to working cooperatively with the province and a project monitoring committee appointed by the province.”</p>	<p><i>The monitoring committee should be established, or at minimum the terms of reference of how the monitoring committee will operate, be populated, and what further opportunities will exist for the public to engage with the monitoring committee need to be clearly articulated in the EAP, or published as a separate document in the public registry file, so that it can be reviewed as part of the IA process.</i></p> <p><i>We acknowledge that the CEC aimed this recommendation at government, however, a proponent that was truly looking to build public trust would be more than receptive, they would be proactive in engaging with the Minister and other government officials, technical experts, municipal governments, etc. to ensure information about the committee was available for review during the IA process.</i></p>	<p>Incomplete</p>
<p><b>(#4)</b> The proponent be required to complete the following detailed plans and distribute them for comment. In so doing, it is recognized that these plans may continually evolve on the basis of additional information, as it is available. i) Waste Characterization</p>	<p>Sio has proposed these same plans in this EAP for review by the EAB prior to initiating Project activities. Some of these plans are included in draft form as appendices in the EAP (Waste Characterization and Management Plan; Groundwater Monitoring and Impact Mitigation Plan; Closure Plan). Others will be prepared prior to commencing Project activities. Draft plans will be updated to reflect any specific EAL</p>	<p><i>The CEC recommended Sio Silica complete and distribute for public comments 10 individual management and mitigation plans, but Sio Silica has only included 3 of these plans in its updated application. Sio states that “others will be prepared prior to commencing project activities.” The CEC clearly recommended that all plans be available for the public to comment on. By not including 7 of the 10 plans recommended by the CEC the proponent is</i></p>	<p>Incomplete</p>

<p>and Management Plan ii) Water Management Plan iii) Progressive Well Abandonment Plan iv) Groundwater Monitoring and Impact Mitigation Plan v) Erosion and Sediment Control Plan vi) Environmental Emergency Response Plan vii) Revegetation Monitoring Plan viii) Heritage Resource Protection Plan viii) Trigger Action Response Plan(s) ix) Closure Plan</p>	<p>requirements information.</p>	<p><i>intentionally shielding these plans from public review.</i></p>	
<p><b>(#5)</b> The proponent demonstrate the full-scale performance of water treatment processes for the re-injection of the water that has been separated from the extracted sand.</p>	<p>“Sio will start sand extraction activities using a stepwise phased approach that includes initiating a limited number of well clusters with a small number of wells. During the initial phase of Project operations, the water treatment processes and performance will be demonstrated”</p>	<p><i>Again, it is not acceptable to use an environmental licence to obtain baseline data.</i></p> <p><i>Sio Silica should be able to demonstrate the safety of the water-treatment processes it is proposing as part of the IA process. This information needs to be included in the EAP.</i></p>	<p>Incomplete</p>
<p><b>(#6)</b> Extraction be planned and operated in a manner that is compliant with the engineering limits suggested by the proponent's experts, required by the Manitoba government and/or as amended based on more data-gathering.</p>	<p>“The Project design reflects recommendations in a geotechnical analysis report (Appendix C) based on a no subsidence scenario. Sio is committed to following the Project design as recommended in the geotechnical analysis report (Appendix C). Additionally, Sio will be implementing a geotechnical Trigger Action Response Plan (TARP) that will be developed during Phase 1 of the Project for extraction locations. The TARP will include criteria for determining thresholds of change that require action to be taken to respond. The TARP will include a risk assessment for the Project including ‘worst case scenarios’, and will describe response methods for specific scenarios, including an early warning system that will halt operations.”</p>	<p><i>The assumption of “no subsidence” is problematic and unsubstantiated. A “worst case scenario” would presume the occurrence of subsidence.</i></p> <p><i>A TARP is not adequate in the light of irreversible risks. The so-called “early warning system” would be equivalent to “closing the barn door after the animals have already escaped.”</i></p>	<p>Inadequate</p>
<p><b>(#7)</b> The proponent be required to carry out a risk assessment that considers the probability of worst-case scenarios (collapse of the limestone layer leading to sinkholes,</p>	<p>“Monitoring of void space using sonar during and after extraction including long-term monitoring will occur as recommended in the geotechnical analysis report (Appendix C). Also see response above for recommendation #6 regarding implementation of a</p>	<p><i>Yet again, the proponent is attempting to use an environmental licence to obtain baseline data. The purpose of IA is to assess “worst-case scenarios” before, not after, a licence is granted.</i></p>	<p>Inadequate</p>

<p>failure of well-sealing) and the consequences of these scenarios and what the response would be to remediate such damage.</p>	<p>TARP which will include surface, caprock and piezometric monitoring and review during and after extraction. The geotechnical analysis model will be updated as more data becomes available for the extraction boreholes, and will include any surface settlement data.”</p>		
<p><b>(#8)</b> A cumulative effects assessment for the full 24-year life of the project be carried out and its impact be considered in light of other existing and foreseeable projects in the area.</p>	<p>“A Cumulative Effects Assessment (CEA) is not an information requirement for Environment Act Proposals under the current Environment Act Proposal Guidelines (Manitoba Government 2023). Therefore, no CEA has been conducted at this time. This Environment Act Licence application fully addresses years 0 to 4 of extraction activities. Any change in potential environmental impact that could result from relocating operations in subsequent years will be addressed through the Notice of Alteration process set out in section 14 of The Environment Act . Each future Notice of Alteration for proposed extraction activities beyond year 4 will: - project a block of proposed annual extraction areas; - describe in detail the existing environment in that block; and - will include a thorough environmental assessment using monitoring data collected during extraction operations and the follow-up activities proposed in the EAP (Section 8). The conceptual hydrogeological model, numerical groundwater model and geochemical assessments presented in Appendix B were developed using previous regional studies, provincial water supply records and field data collected for this Project. Therefore this information, and the follow-up monitoring data collected during Project operation, can provide the basis for a future CEA for the regional area.”</p>	<p><i>The proponent made the same arguments during the CEC hearing, which were rejected by the CEC when the CEC made the recommendation that CEA be done for the full 24-year life of the project. As the CEC noted, it is incumbent on a proponent to do more than the bare minimum.</i></p> <p><i>Sio Silica’s flippant response to doing a CEA, and continued insistence on temporally staged licensing is reason enough to simply reject this application.</i></p>	<p>Incomplete</p>

---

**From:** Tyler Blashko <Tyler.Blashko@yourmanitoba.ca>  
**Sent:** November 27, 2025 11:39 AM  
**To:** Minister of Environment and Climate Change <minecc@manitoba.ca>  
**Subject:** Fw: Public registry 6275.00 -request for CEC hearing

Hi there team,

I think this is the right department to forward to, the request CEC hearing with participant funding.

Thank you,

██████████  
Constituency Assistant

**For: Tyler Blashko**  
**Member of the Legislative Assembly**  
**Lagimodière**  
**(he/him/his)**

*We recognize our office is located on Treaty 1 Territory on the original lands of Anishanaabe, Cree, Oji-Cree, Dakota and Dene Peoples, and on the homeland of the Metis Nation*

---

**From:** ██████████  
**Sent:** Friday, November 14, 2025 1:46 PM  
**To:** +WPG1218 - Public Registry (CWS)  
**Cc:** +WPG569 - Environmental Approvals Branch Director ; Tyler Blashko  
**Subject:** Public registry 6275.00 -request for CEC hearing

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi,  
I'm concerned about Sio Silica application to mine sand in drinking water and request CEC hearing with participant funding.  
Mining in drinking water aquifers supplying entire South East Manitoba should not be allowed.  
They are proposing un tested extraction method causing aquifer to collapse.  
Thanks

██████████  
R3X1K7

---

**From:** [REDACTED]

**Sent:** November 18, 2025 11:39 AM

**To:** Minister of Environment and Climate Change <minecc@manitoba.ca>

**Subject:** Silica drilling into our aquifer.

Attention minister of environment,

Mike, my name is [REDACTED], and I am very upset about Silica wanting to dry drilling into our aquifer. I live with [REDACTED] in Oak Bank Manitoba, and was very pleased when the NDP government shut down silica from drilling into our aquifer.

I went to the meeting about concerns relating to this operation and was very disappointed because it was a half an hour of describing the process of manufacturing through drilling into our aquifer.

What all the people at the meeting really wanted to know was how do we block this from happening?

I am greatly concerned about harming our water supply, as my water supply comes from a well.

I hope that you can understand how upsetting it is when a company could possibly destroy our water supply just to make their millions of dollars in profit. Adding insult to injury, if they do contaminate our water supply, they can't fix it!

In closing, as the world clean water supply diminishes, why would we allow a profit driven company to harm our precious water supply?

I hope that the NDP and you will support the blocking of this enterprise. One of the reasons I voted NDP was the governments overturning the conservative's backing this ridiculous endeavour that could result in catastrophic effects on our water system.

Respectfully submitted by,

[REDACTED]

Sent from my iPhone

---

**From:** [REDACTED]

**Sent:** December 1, 2025 4:09 PM

**To:** Premier of Manitoba

**Cc:** [david.pankratz@yourmanitoba.ca](mailto:david.pankratz@yourmanitoba.ca); Minister of Natural Resources and Indigenous Futures ; Minister of Business, Mining, Trade and Job Creation

**Subject:** Sio Silica - Please Do Not Approve

I am writing to express my extreme opposition to the Sio Silica proposal. I am not going to repeat information that is available elsewhere, but will just share my perspective as someone who grew up in a rural farming community, and then spent my working life in the corporate business world.

I have followed all news articles related to the Sio Silica proposal for the last few years. I also made a valiant attempt to read the 100 page engineers report about the geophysical aspects of the project. I appreciate the efforts of those responsible for the Facebook page "A Line in the Sand" for making detailed background information available, and have reviewed this information as well as following links containing detailed information.

I reside in Winnipeg and would not personally be affected in the way that the Vivian area residents would be. My background is working primarily in the private sector for major corporations. My interest is the same as all Manitoban citizens, I have a vested interest in the potential financial impacts on taxpayers of adverse consequences, as well as the potential short and long term harm to our beautiful natural landscapes.

My reaction when I first heard of the proposal is that it further cements our role as Canadians to be "hewers of wood and drawers of water". To me, the proposed project is an example of allowing our natural resources to be exploited with small compensation to enable much greater benefits for other countries and private investors. After spending many hours over the last few days reviewing all publicly available material my impression has not changed.

It is timely that news sources have recently reported a risk that the city of Tehran in Iran might have to be evacuated because the water supply would not support the population. In Manitoba most of us take fresh water for granted, although we are also well aware of constant threats to this supply imposed by industry, mining, farming and other sources.

It is clear from my reading of the Sio Silica Simba proposal and related commentary from experts that this project does pose substantial risk to Manitobans, not just in the areas where the sand will be extracted but in many parts of the province that depend on below ground water sources.

It comes down to whether the company that would be carrying out the work can be trusted to create and carry out all necessary actions to ensure that there are no unanticipated impacts.

**It does not inspire confidence** when I read about the background of the principals involved in the company, and their admitted plan to take development to a certain stage and then sell it off to another entity.

**It does not inspire confidence** that the mayor of East St. Paul, a neighbouring community, is now involved in the leadership of Sio Silica Simba. Is this not a conflict of interest? And that the mayor of East St. Paul is meeting with North Dakotans to discuss opportunities for processing facilities to be located in their state.

**It does not inspire confidence** that the proposed extraction method has never been used successfully in a production environment and has only had one small test that uncovered issues that are being glossed over.

I believe that our political leaders need to put aside all consideration of the amount of time and money that has been spent by Sio Silica in pushing this project and consider only the weighing of costs and benefits to Manitobans. Costs like environmental damage, loss of personal water supply, nuisance impacts of industrial activity in otherwise quiet rural setting are all difficult to quantify with a lot of unknowns. Very little information seems to have been provided to Manitobans about what the benefits will be, and who will benefit. And possibly the most important aspect is the opportunity cost of the benefits that could be achieved if in the future this resource could be developed in a way that returns more benefits to the citizens of Manitoba.

I appreciate the opportunity to share my views on this project, and would welcome any additional information that might further inform me and possibly alleviate some concerns.

Regards,

██████████, B. Comm., M. Sc. (Winnipeg South Constituency)

██████████

Winnipeg MB

Dec 1/25 gm.

[REDACTED]  
Box 203  
Oakbank, Manitoba  
R0E 1J0  
[REDACTED]

Honorable Mike Moyes  
Minister Environment and Climate Change

Agnes Wittman  
Director Environment Approvals  
Environment and Climate Change

Public Registry

Re: Sio Silica, Simba Sand Project-File#6275

The Sandstone aquifer system being targeted by Sio Silica, is immense and renowned as a world class water resource, developed eons ago. This then, requires special stewardship and protection protocols.

This water is NOW again under direct threat from Sio's latest project iteration, Simba#6275. This has serious ramifications for multiple municipalities/communities that depend on this vital water source(attach#1). Where Sio also has extensive blocks of mining claims.

Brokenhead Objibway Nation(BON) was courted by Sio Silica with dinners and a \$20M profit share inducement-yet they rejected Sio-why? BON remained faithful to their 7<sup>th</sup> Generation respect for Land, Water & Sustainability Principal(attach#2).

How does Sio stack up with respect for land and water and sustainability? Dismal;

- 1) Sio's irreversible breaching of the integral Winnipeg Shale Aquitard barrier has/will result in the intermixing of the Red River Carbonate and Winnipeg Sandstone Aquifers, which is strictly forbidden by the Ground Water and Well Act (2015).
- 2) Sio's reinjection of the oxygenated sand extraction water, entrained oxygen will leach out noxious chemicals from the formerly anaerobic sand medium, into the residual source water.
- 3) Sio's "room and pillar" plan to stabilize their "cluster" extraction sites, is not credible, considering the multiple voids being created in the disturbed sand/water medium.
- 4) Lack of regard for strict safety controls-unsecured sites/wells/multiple large exposed hazardous piles of silica.
- 5) Sio commits to the highest controls/monitoring standards, AFTER their license is granted-they already have 75 wells, to provide the needed base line information.

I protest Sio's resistance to submit a full cumulative impact assessment for All aspects of their intended project.

Sio being an out of province entity, with out of country partners/financing i.e. RCT(Germany), Pyrophyte (Cayman Islands), raises major red flags. The only security requirement in play, is a \$10M insurance coverage (that has a six month revokable clause) on a nonexistent Sand Processing Facility.

I protest the irreversible exploitation of this precious water source-requiring the outrageous brutalization of the environment-all JUST for profit taking by opportunists.

We are facing a 'FLY/SPIDER' moment ... STOP... BACK AWAY... while it is still possible!

We must hold true to our 'MORAL COMPASS' and REJECT this ASSAULT by Sio.

I am requesting that you, representing our best interests, will stay the course, set by the Kinew Government, February 2024 and BON, August 2025, and DENY any further license to Sio Silica.

Yours sincerely,

A large black rectangular redaction box covering the signature and name of the sender.

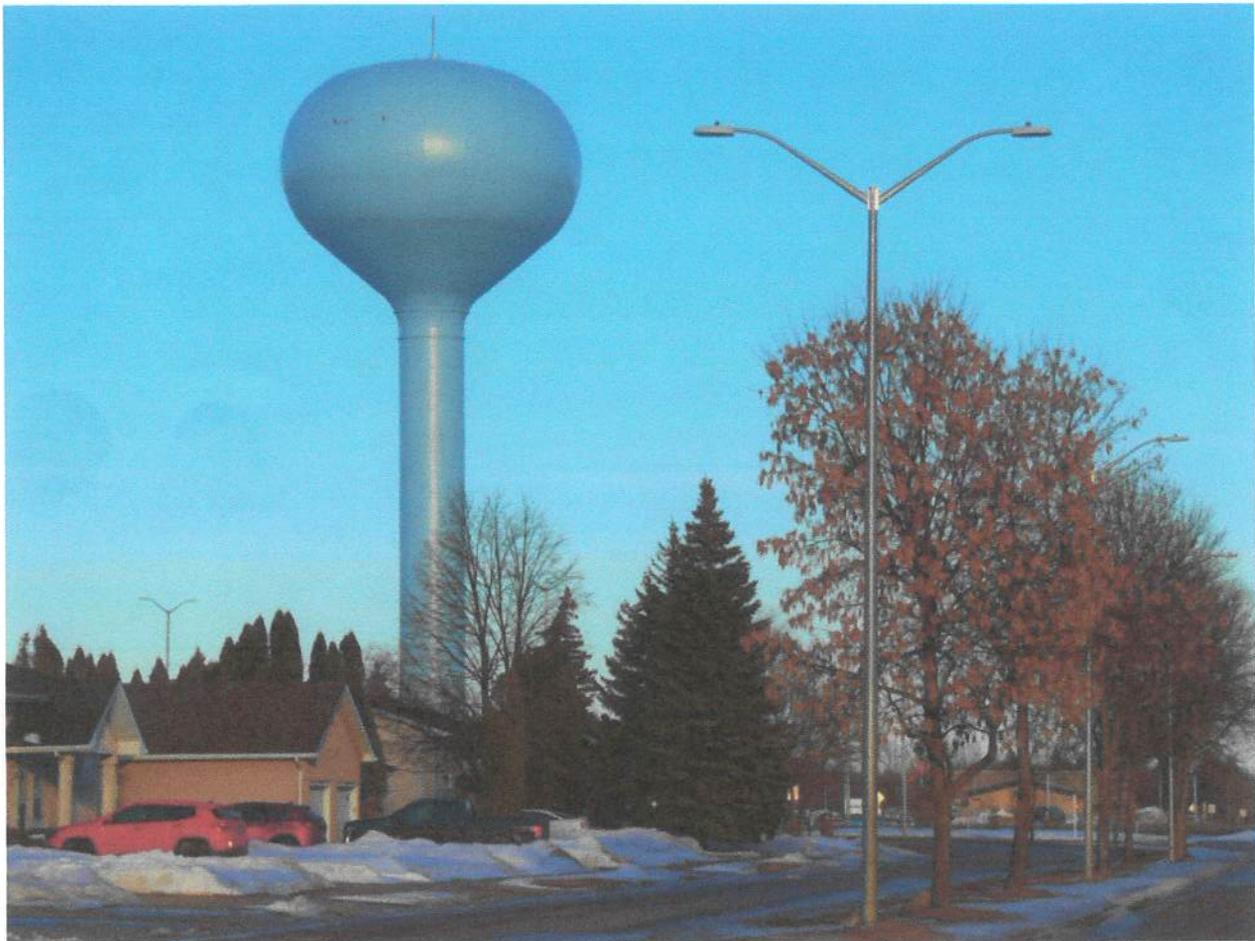
#1

LOCAL NEWS

# Steinbach to submit comments on Sio Silica proposal

Judy Peters, SteinbachOnline.com | Sunday, Nov 30 2025, 5:00 AM

Share:



*The water tower for the City of Steinbach.*

Steinbach City Council has voted to submit comments to the province regarding Sio Silica's latest Environment Act licence application, stressing the need to protect the aquifer that supplies drinking water to the region.

Administration recommended the city take part in the current provincial commenting period, which closes December 1. City Manager Troy Warkentin told council administration has been reviewing the application and believes the city should again make its concerns known.

"Since the last council meeting where this item was brought up, administration has been reviewing the Environmental Act license application by Sio Silica and the advice that there is a current commenting period that any interested parties may provide comments. While administration still is reviewing the application, what we have read so far, and based on the city's understanding of the previous application by Sio Silica, administration is recommending that the city submit comments to the application process by the December 1st deadline."

## Council supports submitting concerns

A motion was introduced by Councillor Susan Penner and seconded by Councillor Jac Siemens.

"While I understand that mining for minerals is important, I would argue that water is the most important resource that we have," Penner said.

She added that council should also be prepared for the objection period that follows.

"We do not want to mess around with our water aquifers. So it is imperative that we take this seriously and do what we can to make sure we protect our water."

Siemens agreed, saying the proposal involves the same aquifer used by Steinbach and communities across the region.

"While it is downstream from us, it could potentially have a devastating effect on our communities."

He noted that during Sio Silica's previous application, Steinbach filed comments and later gathered support from other municipalities during the objection stage.

## Mayor says water must come first

Mayor Earl Funk supported the motion and emphasized the regional significance of the issue.

"It's not just Steinbach that takes the water out of this aquifer. There's probably about, I'm believing around 12 municipalities that also use this aquifer. So this doesn't just impact Steinbach, this could impact the entire region."

Funk said he believes in responsible resource development, but water remains the top priority.

"I am a proponent of using our resources, selling our resources, and this is a good thing, but our water is more important."

Council voted unanimously to approve administration's recommendation.

## Siemens expands on concerns after the meeting

After the meeting, Councillor Jac Siemens expanded on why he believes council must act early in the provincial review process.

"You know, we always take our water for granted. Beautiful water. Steinbach has always been known for its water."

He described how the region's water moves slowly through the Sandilands Provincial Forest and limestone formations before entering the deep aquifer that supplies Steinbach.

"And so it takes years for that water to get down there. That's where water, our water comes from."

Siemens said the city must do everything possible to safeguard the resource.

"I think that we need to do whatever we can to protect that resource, because that is the future of Steinbach."

He added that the consequences of losing that water supply would be significant.

And today, we stand at a defining moment. We have the awareness, tools, & strength to heal the wounds of the past & shape a new future. Picture a world seven generations from now - one that looks back on this era as the turning point, when we chose to honor history, cultivate unity, & lay the groundwork for respect, equity, & sustainability. #2

This principle isn't just about big political decisions - it's a way of life, impacting every choice we make. This philosophy is deeply relevant in all areas of life, but I'm going to focus on some of the most crucial areas.

### **The first is 1. Land, Water & Sustainability**

This is typically the first thing people often associate the Seven Generations Principle with. It asks us to consider how our use of natural resources, our water, our land, and our energy, will affect the world seven generations from now. Will they have clean water? Fertile land? A stable climate? This principle reminds us that we are just borrowing the Earth from future generations. Take a second to let that sink in. We are really just borrowing the Earth from our future generations.

### **2. Relationships & Community**

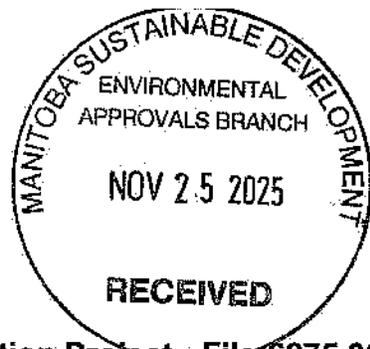
And The Seven Generations Principle isn't just about the environment - it extends to our relationships and the ways in which we treat each other. Imagine if every interaction, every decision we made in our personal lives and communities, was guided by the question: *Will this contribute to strong, healthy relationships for generations to come?* It challenges us to think beyond the immediate moment and build a legacy of respect, care, and unity.

### **3. Healing Work & Breaking Cycles**

This principle is also an incredible tool for personal and collective healing. Generational trauma is real, and harmful patterns can be passed down if they are left unaddressed. The Indigenous People of New Zealand, the Maori, also have similar concepts to the seventh generation principle. As Maori artist Tāwera Tahuri puts it, "It serves not only as a reminder of the wrongs of the past but also the hopes and

November 23, 2025  
Box 352 Beausejour, Manitoba R0E 0C0

The Public Registry  
Winnipeg, Manitoba



**SIMBA Operation - Vivian, Manitoba Silica Sand Extraction Project - File:6275.00**

As a resident I am very concerned about the current proposal submitted by the consultant for SIMBA and the behavioral mannerism of Simba in their attempts to obtain the rights for an environmental licence to drill and process silica sands in the Vivian area in the RM of Springfield. What are the effects the mining by drilling will have on the environment and the immediate surrounding area? Will Simba carry out their part of responsibility to repair and be accountable for the liability to any environmental damage(s) and cleanup on private, municipal and crown lands? Will Simba carry out their part of responsibility to decommission and restore an area after the silica sand has been mined out? Their document submissions are in my opinion just painted words to get that approval for the licence to mine. Their enticement of large cash payouts annually to the First Nations is only enticement to get their support to obtain the mining rights. Once the licence is received, I believe Simba may not fully honour their commitment(s) to the First Nations and / or become non-existent. Senior management has a history of unfolding and making sudden name changes. This was done with CAN WHITE and SIO SILICA. Once Simba is in operation their approaches of promises and handouts to the First Nations may be shallow promises when issues occur or Simba unfolds? Simba should set aside annually large amounts of funds that will be required to decommission and clean up an area. Simba realizes and understands the First Nations partnership is a strong doorway to success for the licence. What happens to the partnership when Simba unfolds? The cleanup costs will fall unto the taxpayers..

Is the science for drilling a sure science? It is very important to know if it is carried out elsewhere and what problems have been encountered? Our water is extremely precious and the most important life bearing natural resource on this planet. Simba in my opinion is like "thieves in the night" will disappear and do a name change when problems are encountered.

**Contaminated groundwater can never be cleaned up!**

In closing I am not in favour of granting Simba the mining rights to drill for silica sand at this time until the science for drilling is a proven method and their mannerism towards the general public has improved. Why is the open house on November 24th at the Regent Casino and not in the community of Anola or Dugald?

[REDACTED]  
[REDACTED]  
Resident  
[REDACTED]



November 26, 2025

Agnes Wittman, Director  
Environmental Approvals Branch  
Manitoba Environment and Climate Change  
Box 35  
14 Fultz Boulevard  
Winnipeg, MB, R3Y 0L6

Dear Ms. Wittman:

Re: Sio Silica Corporation (aka HD Minerals, aka CanWhite Sands) (Calgary, AB) SIMBA Sand Extraction Project (aka mining in our drinking water) File: 6275.00

**"I think we have to recognize that there is a global shortage looming in high purity quartz silica and that we have the largest deposit in the world with the highest purity in the world. Therefore, it's inevitable that the project, that the resource will come out of the ground."...Carla Devlin, President of Sio Silica**

Ms. Devlin is also the mayor of the RM of East St. Paul, a lovely community that gets some of its drinking water (Well P-08, Oasis Road) from the RM of Springfield partly because its water was irretrievably contaminated by petro chemicals decades ago.

And no, a world-wide sand shortage of whatever magnitude cannot in the slightest compare to the current drinking water shortage experienced by the same planet.

**"Déjà vu all over again." Yogi Berra**

Almost two years ago, after much volunteer work and personal expenses and fundraising, we citizen scientists and advocates defeated Sio Silica (SS). We revealed the dangers of mining in our drinking water and SS was refused a licence. Regrettably, the Clean Environment Commission (CEC) felt the curious need to keep this corporate creature alive by throwing it a life jacket of recommendations. Presumably, if SS rose to the occasion and addressed those recommendations then mining in our drinking water would be approved. This is a sham. It is form over substance. The CEC is essentially coaching SS to embrace its selected "gateway"

recommendations, and ignoring the overwhelming sentiments of the owners of the sand and water. The anti-resident sentiment demonstrated at our single day public consultation in 2023 with the CEC shows through.

**“a prophet is not without honour, except in her own province” Matthew 13:57**

But why do we need this redux? In 2023, and in a matter of weeks, Canada’s top water toxicologist wrote an exhaustive 563 page epistle eviscerating the initial SS Environment Act Proposal (EAP). Celebrated throughout the nation and shunned in Manitoba, Dr. Eva Pip demolished the SS sand castle. We are here again because the Environmental Approvals Branch (EAB) and the CEC apparently could not grasp the weight of Pip’s prophecy. Nor understand it.

**“the law is an ass” Mr. Bumble in *Oliver Twist***

The CEC, in response to SS’s initial EAP, issued eight recommendations as listed in SS’s “Concordance”. Seven were directed to SS, one to the province.

Of the seven recommendations directed to SS, the proponent has flatly refused to honour number 8, being the need for a Cumulative Effects Assessment. In a curious act of rebellion, SS has flatly refused to contemplate this recommendation. One would think that SS, a vulnerable supplicant, would at least ponder the idea of a CEA. But you would be wrong. The other six recommendations are exactly what SS needs to proceed in the context of a civil service that is now beyond its depth, lacking the skills to police SS’s performance.

It was recommended that the Province of Manitoba obtain a legal opinion on mining in aquifers. The Concordance captions this as “not applicable” to SS. It is, however, critical that such an opinion be obtained now. If the opinion declares such mining to be in contravention of provincial legislation, we can all go Christmas shopping.

On November 20 I requested an update on this from the Deputy Minister of Environment and Climate Change (MECC), but Jocelyn Baker has not replied as of this submission. Nor has Ron Schuler, my MLA in Springfield.

Sections 2(e) and 3(1), respectively, of the *Well Standards Regulation under The Groundwater and Well Water Act* say this:

**"A person must not construct or seal a well or test hole other than in a manner which prevents the interconnection or mixing of groundwater having distinctively different characteristics within the same aquifer or different aquifers.**

**"... a person must not construct or seal a well or test hole in a manner that allows the interconnection or mixing of groundwater between the Winnipeg Formation and any overlying aquifer."**

Section 6(1) of the *Drilling Regulation* under *The Mines and Minerals Act* says this:

**"A licensee shall drill and abandon a borehole in such a manner as to prevent the vertical movement of fluids between permeable water bearing zones penetrated by the borehole."**

In her exhaustive report on the SS EAP of 2023, Dr. Eva Pip concludes that such mixing is inevitable given the enormous and unyielding power of Nature to overcome human intentions and inventions. The boreholes will all eventually leak, anonymously. Every stinking one of them. Sooner or later.

SS is audacious in its rejection of a CEA. The CEC has become a co-proponent by lobbying soft recommendations, which only challenge SS to be patient. The Province of Manitoba is asinine in ignoring the call for a legal opinion.

**"plus ça change, plus c'est la même chose" Jean-Baptiste Alphonse Kerr**

Since its rejection in 2024, SS has been working on what amounts to an appeal. Can there be any doubt that it has lobbied decision makers? SS filed its second raft of claims and opinions with the EAB on October 28, 2025. It entails 841 pages. In response, the EAB gave the owners of the sand in question 35 days to comment. This is business as usual at the EAB. This time the EAB added the unenforceable wrinkle that respondents use an online form. To some this will be intimidating. Regardless, the EAB will not publish individual responses until the 35 days are over. This prevents interactions among opponents which could lead to the education of concerned citizens. In this manner the EAB seeks a cheap absolution in its deficient form of consultation. Citizen activists unknowingly become complicit in the trivialized EAB process.

**"Bah! Humbug" Ebenezer Scrooge in *A Christmas Carol***

The EAB has refused "participant funding" as allowed by *The Environment Act*. Again, this unfairness is habitual at the EAB.

The EAB has declared this mega-project to be a Class 2 Development. Accordingly, SS paid \$7,500 to file its EAP. It is really hard to grasp how the EAB reasons that a heavy industrial enterprise that threatens our drinking water is not a Class 3 Development where the filing fee can reach \$120,000. This justifiable fee could have been used to fund participants, but that would be too empowering. Furthermore, the ex-premier of Manitoba and her co-conspirators were found guilty of meddling in due process and were fined \$40,000. A small penalty, but it could also be used to fund intervenors. Scrooge was never as parsimonious as the EAB.

**“Your call is important to us” Ma Bell**

In the same advertisement that ostensibly invites public participation the EAB provides a telephone number for public use. Curiously, it is merely the general government enquiry number. It is neither the EAB number, nor a number for MECC. The caller must ask for the number that should have been published. Nor has the EAB declared a contact person on this file, as was its custom.

If the EAB wants to be a co-proponent, let us know.

**“What, me worry? Alfred E. Neuman**

AECOM acts as SS's consultant. Here is how it couched its preamble to this EAP (and the initial, rejected one).

1. The report “has been prepared by AECOM...for the benefit of [Sio Silica].”
2. The report “may be based on information provided to AECOM which has not been independently verified.”
3. The report “may be based on limited testing.
4. The report “may be based on the assumption that such conditions are uniform and not variable either geographically or over time”. ***Note this disclaimer, especially.***

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Based on AECOM's wide-ranging disclaimers, the EAP is unenforceable.

### **Simba, a Disney fantasy. SiMBA, a Manitoba fantasy**

SS now proposes a five-year "stepwise phased approach". It is suggested that this will be more palatable to the public. In the first year 100,000 tonnes of sand are produced. In year two, 200,000 tonnes. The last three years will produce 500,000 tonnes each year.

Presumably, after five years of phasing the progeny emerges—1,360,000 tonnes per year throughout the long life of SiMBA. This was the production amount predicted for Year 6 in SS's original EAP which had a death span of 24 years.

Hands up, everyone who believes that the provincial civil service will independently audit this "stepwise phased approach". For you I will have waterfront rooms with pillars for sale.

### **"Show me the money" Tom Cruise in *Jerry Maguire***

Because SS is not traded on a stock exchange it does not publish its financial statements. We are not informed as to its assets, debts or contingent liabilities. *"Hey, Buddy! Wanna get a loan to buy a used car?"* The bank wants to know all about your finances! *Wanna mine in our drinking water?* No problem! Where do we sign?

Nor are Manitobans told what they will get in royalties for the sand or, if like Manitoba Hydro, SS will have to pay to rent the aquifer's water like Hydro rents the water in Lake Winnipeg.

### **"What, me frack?" Anon.**

In 2019, the CEO of SS appeared before Noble Capital in Florida. There he sought investors to help fund mining in our aquifers. He reported that all the sand would be sold for fracking. In 2023, during SS's EAP for the Vivian processing mill, it claimed that 60% of the sand would be used outside oil and gas industry. This implies that 40% could be available for fracking. The current EAP declares that *"No sand will be used in fracking of any kind."*

I guess that's just too bad for Canadian liquid natural gas (LNG) production, **most of which needs fracking sand**, and lots of it.

Is this promise includable in a prospective licence? If SS is sold to another company is the promise moot?

A fluid situation, to be sure. It can be avoided by refusing SS's current entreaty.

**“Water is taught by thirst.” Emily Dickinson**

The current EAP claims to be a demonstration that SS's long term plans are benign. Evidence is purported to be fewer wells as compared to the original EAP of 2023.

However, it is still 492 wells over 5 years. These wells will be operational for only five to seven days, but the biggest nightmare is that they will be abandoned for eternity. For the remaining 19 years of SiMBA's death span the number of wells will increase dramatically. Whatever human technique is deployed to seal the wells will eventually fail. It is inevitable.

**The provincial civil service will not track and inspect these nightmare wells.** According to the University of Calgary's School of Public Policy (2023, *The Globe and Mail*) there are more than 170,000 inactive oil and gas wells in Alberta awaiting delayed vital attention.

Abandoned oil wells on private land in Alberta have discouraged banks from approving mortgages upon the proposed sale of those lands. This also reduces market values and impairs a municipality's source of property tax. Will SS, or its successors, compensate landowners and municipalities? The Alberta experience is that offending companies walk away. In its 2022 Budget the Province of Manitoba identified \$50.7 million to remediate orphaned and abandoned mines left behind by companies that walked.

In 2000, a **single** well contaminated by cattle manure killed 7 people and sickened over 2,300 in Walkerton, Ontario when the city's drinking water was contaminated. Any chance that cattle and other livestock will ever poop on top of one of the thousands of wells sealed by human hands and scorned by Mother Nature? Or that rains and snow melt will flow into compromised wells carrying animal waste?

**“What are we, chopped liver?” North End colloquialism**

In 1988, another out-of-province corporation sought to mine for gold near Shoal Lake, the source of drinking water for Winnipeggers. This caused an apoplectic response from civic and provincial politicians. In short order, and on June 30, 1989, a 23 page Memorandum of Understanding was signed by the Shoal Lake Band No. 40, Her Majesty in Right of the Province of Manitoba and the City of Winnipeg. The mine was cancelled.

So, what are rural residents who draw groundwater for drinking? Chopped liver?

Maybe the Mines Branch thinks that we are. For years it protected the privacy of SS, even though the prospects were alarming. That was when the civil service could have, and should have, scoped this sand mining as being unreasonable risk. And slammed the door on it.

Why do the folks who own both the water and the sand get treated like chopped liver. Maybe someone at the corner of Selkirk and McGregor can tell me.

**"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". Justice Horace Krever (Inquiry on the Blood System in Canada)**

SS covets the sand in our utterly spectacular sandstone aquifer. That lovely ground water serves thousands of residents. It also supplies schools, hospitals, seniors' residences, community clubs, shopping, centres, curling rinks, golf courses and so on.

SS cannot be allowed to compromise our lives. Clause 7 of *The Charter of Rights and Freedoms* says that *"Everyone has the right to life, liberty and security of the person."* If safe water does not embody our security, what does?

Yours truly,

[REDACTED]

[REDACTED]

**ORIGINAL SENT BY REGISTERED MAIL**

Point #5

December 1, 2025

Honorable Mike Moyes  
Minister of Environment and Climate Change

Director Agnes Wittmann  
Environmental Approval Branch  
Environment and Climate Change

Manitoba Public Registry  
Re: File No. 6275.00 – Sio Simba Sand Extraction Project

I am a resident within the RM of Reynolds. I am concerned about the Sio Silica Proposal to break into the aquifer at Vivian, Manitoba. This is an extremely good source of 'clean water' which is very valuable for human consumption.

As an Environment Identity, we should be 'very concerned' about intruding on such a valuable resource. So why would anyone be allowed to risk contamination of this fragile resource? In this case, there is no turning back. We cannot afford to use this project as a testing arena. The process has not been tested. In reality, there are always problems that are not foreseeable with a new technique.

The sandstone is not a renewable resource! This is what contains the water and supports the overburden above. Once removed, the natural support is gone. Downward pressure from the overburden will cause settling. The project is a 500 year timeline according to Sio Silica. What occurs after that? Also that is speculation.

Uses – The proposed uses for the sand are not imperative to our human existence. We can do without high rise glass buildings, cell phones, computer technology, and other spinoffs but we need water for the future.

Environmental Trusts are for saving the planet. Let us start here and eliminate possibility for disaster for the future generations for whom we are so concerned.

There is nothing in the proposal that this world cannot do without. Water we need. The numbers Sio is projecting are all hypothetical to get the province to have them get a 'yes' to proceed. We have seen this happen this pasts summer as in the case of the Province allowing the City of Winnipeg to dump raw sewage into the Red River.

