



Writer's email: chkla@legalaid.mb.ca

March 13, 2023

Mr. Peter Crocker, Secretary
Manitoba Clean Environment Commission
305-155 Carlton Street
Winnipeg MB R3C 3H8

Dear Mr. Crocker:

Re: Corrections and Erratum slides from Mr. Louis-Charles Boutin

I write to provide two corrections to the record relating to the testimony of Mr. Louis-Charles Boutin of Matrix Solutions Inc. on March 8, 2023. Both of these issues were expressly raised during the hearing and are matters upon which Mr. Boutin committed to following up.

Enclosed is an Erratum version of Mr. Boutin's slide presentation which identifies these corrections on pages 29 and 43. Explanations of each are provided below.

Slide 29

During his presentation, Mr. Boutin explained that he had identified an error related to a stated assumption of the diameter of a typical water well in the version of his slide presentation that had already been circulated to the Commission and hearing participants.¹

¹ Clean Environment Commission Hearing Transcript, March 8, 2023 at page 37, line 25 to page 38, line 7.



This error had been corrected in the slides displayed during his presentation and is now also corrected on slide 29 of the Erratum version enclosed.

Slide 43

During cross-examination of Mr. Boutin, legal counsel for Sio Silica Corporation Mr. Sander Duncanson requested clarification of figures presented on slide 43 of Mr. Boutin's presentation.

The transcript of Mr. Duncanson's preamble and question reads as follows:

"...there's a reference on the top left of the slide to volumes of water consumed by individuals per day in different models, and you -- you highlighted that Friesen 2019 used a value of 300 litres per day per person, and that AECOM used a -- a different value of 200 litres per day per person...Would you take subject to check that in fact the Friesen 2019 study...does in fact use a 200 litre per day per person value, not 300?"²

In response, Mr. Boutin committed to checking the references for the figures provided.³

As noted by Mr. Duncanson, Mr. Boutin had cited a 2019 report prepared by Friesen Drillers Ltd. ("Friesen 2019") for the figure of 300 litres of water consumption per person per day.

As set out at slide 43 in the enclosed Erratum slide presentation, the correct source for the figure of 300 litres of water consumption per person per day is a 2015 report prepared by Friesen Drillers Ltd. ("Friesen 2015") regarding groundwater supply for the Town of Niverville.

Mr. Boutin further provides the below references for the assumed volumes of per-person-per-day water consumption presented on Slide 43:

Wang 2008 P.1332; *"If we assume the pumping rate is 0.5 m3/d in each private well, then the total pumping rate is about 8,212,500 m3/yr."*⁴

Friesen 2015 P.1; *"Assuming an average water supply demand per person of 300 L/day, the Town of Niverville would need approximately 455 U.S.G.P.M."*

² Clean Environment Commission Hearing Transcript, March 8, 2023 at page 98, line 17 to page 99, line 4.

³ Clean Environment Commission Hearing Transcript, March 8, 2023 at page 99, lines 9-16.

⁴ Although Slide 43 references the SRGMP 2010, Mr. Boutin notes that this figure is from the underlying Wang 2008 numerical model.



Friesen 2019 P.1; “Assuming a per capita average daily demand of approximately **200** L/person/day, the required supplemental water supply would require a water supply of approximately 40 L/s, or 634 U.S.G.P.M. for a 25-year design period.”

Friesen 2019 P.81; “Finally, the value for domestic use was conservatively estimated by assuming each of the 6,500 wells in the GWDRIILL database (2016) supplies groundwater for a family of four at the average rate of **250** L/day/person”

The Friesen 2015 report referenced above and relied upon by Mr. Boutin can be provided upon request.

Any questions or concerns regarding these corrections may be directed to the writer (chkla@legalaids.mb.ca) and Mr. Byron Williams (bywil@legalaids.mb.ca), legal counsel to the Manitoba Eco-Network and Our Line in the Sand.

Thank you,



Chris Klassen*
Attorney

*Chris is an independent lawyer retained by the Public Interest Law Centre in this matter.

/ck

Enclosures (1)

cc: CEC Mailing List, Vivian Silica Sand Extraction Project.

