

Darlene Ans



March 22, 2023

Chairman and Commissioners  
Clean Environment Commission  
305-155 Carlton St.  
Winnipeg, Manitoba, R3C 3H8

Re: Sio Silica Sand Extraction Project

Dear Chairman and Commissioners:

I am writing this letter on World Water Day and the first day of the First UN conference on world water, to emphasize the importance of clean water.

**“The earth has an abundance of water, but unfortunately, only a small percentage (about 0.3 percent), is even usable by humans. The other 99.7 percent is in the oceans, soils, icecaps, and floating in the atmosphere.**

**Once an aquifer is contaminated with chemicals or petroleum, it is difficult, if not impossible, to clean up. Therefore, prevention of contamination is paramount. (National Ground Water Association)”**

We need to protect our water for our children and children’s children.

After attending the CEC Hearings, I have several serious concerns with the Sio Silica Sand Extraction Project.

- The method of drilling that Sio Silica intends on using is unproven technology.
- The Bore hole size that Sio Silica intends on using is large. One borehole is the approximate size of all the current water wells drilled for use as potable water in the south eastern aquifers. Sio Silica intends to drill as many as 2000 bore holes that size during its operation.
- Current private water wells are not closely spaced but spread out over both aquifers. Sio Silica intends to drill in an intensive pattern within small, grouped areas creating a pincushion effect. How well will the natural filtration process, that has worked for millions of years function when such an extensive penetration is employed. Any child can demonstrate how well a filter works when you punch so many large holes in the filter.

- With such extensive drilling in small, grouped areas I am concerned about collapse of the aquifer layers.
- There has been no mention of long-term maintenance of abandoned wells and failure of wells into the future. An abandoned well needs to be monitored and maintained to preserve its integrity. Who will pay the cost and should our children and children's children bear the cost and possible contamination issues of unmaintained wells.
- At the very least, mandatory statement of procedures for closing of abandoned bore holes and financial responsibility should be written into the CEC report and a fund established for maintenance of the boreholes in perpetuity. Let us learn from Alberta, who now are using public funds to deal with abandoned oil wells because the owners of the wells have refused to do so or are no longer in business.
- I question Sio Silica's dedication to highest standards and safety, which they have emphasized over and over. Open silica piles were left on their property and weren't covered until Workplace Safety and Health issued an order to cover the piles. Silica sand is a known carcinogen that is inhaled into the deepest sections of the lungs. They did not take precautions to keep people safe. How well will they protect our drinking water?
- Sio Silica is only applying for a 4-year license from the CEC, but they state that their project will be for approximately 24 years, with no need to go back to CEC for the remaining years of project. This is not acceptable.
- No one has compared the future value of clean safe water in perpetuity to the short-term value of the Sio Silica operation.
- What is the value of the agricultural economy in southeastern Manitoba that would be effected if the aquifers were contaminated? What is the cost of providing a safe alternative drinking water to the entire population of people that depend on these aquifers for safe drinking water. Where would you even get the water to supply these groups?
- I am very concerned that CEC refused to supply funding for opponents of Sio Silica to mount a defense and hire their own experts. Sio Silica owns gold mines and silver mines around the world. They can pay for many lawyers and experts to take their side, as demonstrated by the many tables occupied by the Sio Silica contingent at the CEC hearings. Groups in opposition do not have these resources.
- The way the project has been split by the government and this review to further their approval process decreases the consequences of the mining operation.
- Lastly, Council for Sio Silica stated in closing arguments that the aboriginal community was in support of the project. What was not stated at the hearing is the following taken from the The Clipper Vol 32 No11 March 16, article: Sio hearings in Anola, Beausejour, which demonstrates support under duress, misgivings with the project and distrust of the process.

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“Peguis First Nation’s Mike Sutherland...Director of Peguis Consultation and Special Projects in over 30 environmental projects.....the band has made the hard decision to support Sio Silica and “take things into our own hands” as the environmental monitors of this project. “We have never seen the CEC turn away a project.....We have four legal firms, we have six environmental firms working for us. We will do our damndest, our due diligence, that the water is protected. If we don’t do it, and we are not in the room, we can’t offer that, and I don’t know who else will”

- Also in opposition to this project as stated in their presentation are: the members of the Municipal Silica Sand Advisory Committee (MSSAC), being the rural municipalities of Tache, Ste. Anne, La Broquerie, Hanover, Brokenhead, Reynolds, St. Clements, and the City of Steinbach.

In conclusion I ask the CEC to deny the application of the Sio Silica application before the CEC.

Please consider the future value of clean safe water in perpetuity to the short-term value of Sio Silica operation.

Sincerely,

*Darlene Ans*

cc.

Mr. Kevin Klein, Minister of Environment and Climate  
Mayor and Council, Rural Municipality of Springfield