

From: [REDACTED]
To: [+WPG725 - Clean Environment Commission](#)
Subject: objection to the Vivian Silica Sand Extraction Project
Date: March 24, 2023 1:39:01 PM

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Dear Commissioners,

Please register my objection to the Vivian Silica Sand Extraction Project.

The information available about this proposed project does not allow for a comprehensive environmental review for licensing. This is evident from the omissions and material deficiencies listed in the motions filed by Participants. To grant an Environment Act License to this project is not in the public interest. I am writing to you to highlight the following specific concerns.

First, the EA process allowed for separate assessment of the processing facility and the sand extraction project. It also addresses only a short 4-year period out of the 24-year life of the project. "Project splitting" is highly criticized as it prevents full assessment of all environmental, economic, and social risks and impacts from a project.

Second, the mining, processing, and transport operations will operate 24/7/365 within 100's of meters of many homes in the area. Potential for noise and air quality impacts have not been adequately assessed, and assessment of artificial light pollution has been ignored.

Third, the extraction will have direct impacts on the land. Trees will need clearing and loss of habitat will impact known species at risk. Wildlife will be disturbed by round the clock noise, which can result in negative impacts to the local ecosystem. Access roads are required for the heavy machinery and truck traffic, impacting farm land and livestock. Mining operations will create continual distress and worry, will impinge on the enjoyment of our property, and can negatively impact our livelihoods and communities.

Fourth, tens of thousands of industrial sized double cased wells will be drilled and abandoned. The casings and sealing compounds degrade over time. These wells will be perpetual sources for groundwater contamination. These wells will be on private property and will impact our property values, use, insurance, liabilities, and future development.

Fifth, the effects of removing 1.36 million tonnes of silica sand per year from the aquifer was not assessed. There are significant concerns about subsidence and sinkholes developing as a result. Potential hydrogeological impacts from subsurface geotechnical failures of the shale aquitard were also not assessed.

Sixth, sterilization of injected process water into the aquifer is a major component pivotal to the project that should have been thoroughly proven prior to beginning the licensing process. It "remains at a conceptual stage" with no sufficient information available. This is a serious flaw in the project that is particularly distressing given the need to protect local and regional groundwater resources. This gives us as area residents no certainty that our water will remain safe.

Seventh, this project does not have the free prior and informed consent of the Broken Nations whose water will be impacted by this project. This is a human right protected under UNDRIP and section 35 of the constitution.

Eighth, accumulative impacts of the project were not considered at all nor were the GHG emissions. With the recent IPCC report sounding the final warning for all to take moral responsibility for reducing GHG for the health of future generations and the environment, this is not acceptable.

Ninth, the technical review provided prior to this hearing stated that the company does not address the fact that their computer simulation and modeling and testing practices had substantial errors, missed critical factor. The technical review said their claim that there is only short-term reversible impact is not credible. I am not sure how this is even going forward to this level of a hearing if they have not sufficiently proven how they will mitigate enviro impacts.

Tenth, their Groundwater monitoring plan basically said they will assess an impact/risk and respond with an appropriate mitigating measure such as "provide water to those impacted while assessing and rectifying the situation and cease sand extraction from the well." That is not a proactive plan, let alone a reassuring one. I don't think there is a mining company in existence that doesn't impact water quality and quantity. If a company cannot admit the likely impacts of their project, they are not going to be prepared to adequately handle the situation let alone return the water and ecosystem back to its healthy natural state - this project will absolutely impact water quality and water quantity and they are not prepared.

Water is our most precious resource. The Carbonate and Sandstone aquifers are valued and should not be put at risk from the proposed project. **These freshwater aquifers are critical drinking water source for southern and Interlake regions and must be protected.**

This proposal has attracted the attention of thousands of Manitobans who are opposed to putting aquifers at risk.

In light of my concerns, I urge the Commission to strongly recommend denying the

licensing of the project.

Sincerely,

Alana-Dawn Eirikson

Calgary, AB

Grew up in Manitoba, Lake Winnipeg area.