



September 20, 2019

Laura Friend  
Manager, Board Reviews  
Natural Resources Conservation Board  
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Tel: 403-297-8269  
*Letter delivered by e-mail September 20, 2019*

Dear Laura Friend,

RE: Board Review – Rebuttal to RFR submitted by Darwin Eaket

Please accept this letter as a rebuttal addressing concerns of Darwin Eaket regarding our NRCB approval to increase head numbers at our CFO located at NE-27-29-26-W4M Kneehill County.

Mr. Francisco Echegaray the approval officer on our file did an exceptional job addressing the statement of concerns. I will reference his review throughout this letter. I have added a few other items for the board to consider.

Below are the list of Mr. Eaket concerns and our comments as a rebuttal;

Traffic Fatality – Our operation is continually improving and working towards a safe environment for our team members, neighbours and community. We work with a safety consultant to help us improve on our safety procedures and we meet with our crew regularly to discuss safety matters. We emphasize to any of our equipment operators or truck drivers to drive carefully, follow traffic signs, speed limits and other traffic/driving rules. We water our roads during silage and manure haul to reduce any dust and to help our drivers and neighbour's visibility when driving. With Francisco, along with Alberta Transportation we reviewed the increase in traffic. She determined based on our communication no AT permit was required.

Family Health and Quality of Life – Please refer to Francisco and Alberta Health & Safety officers conclusions from the review. We were impressed with how thorough the AHS officer took the review to address these concerns.

Korova owners, family members and employees live in the surrounding area of Korova/Acme. We understand that CFO's can smell. Korova prides itself in managing our manure in the most effective way we can. Once weather permits, we are scraping pens, spreading and pro-tilling into the soil on owned and neighbouring land as efficiently as possible to reduce any smell/burden on our neighbours. We are also very excited about the Rolled Compacted Concrete (RCC) that we are starting to place on the floor pens. This technology based on research provided by Alberta Agriculture will reduce manure by 30%. This will mean that, although our permit will increase from 16,000 to 20,600 (an increase of 28.75%) we don't expect more manure to be transported to the fields and spread. Based on a presentation on these results from Alberta Agriculture, they also observed that the RCC pens versus Clay lined pens had less dust. We are confident that the RCC technology will improve CFO's efficiency in removing manure which ultimately will have positive impact on smell and flies.



Water Quality – Korova is well designed where all surface water runs to our catch basin. We are not increasing our existing footprint. Francisco also comments on both surface water and groundwater quality and highlights that we meet or exceed all AOPA requirements and the risk posed by this facility is low.

Property Values – It is important to us for our employees to live in our local communities (rather than commute from cities), therefore Korova decided over the last 5 years to invest in homes for our employees to live in. Korova has purchased 2 houses in Acme, 1 townhouse in Linden, 1 apartment building in Linden, and its owners/family members have purchased acreages/land in the surrounding area. We are also excited for our employees who have purchased their own acreages and homes in the area. We have brought economy to the community, where we purchase significant amount of feed grains from our neighbours, support community programs, and employ 40 people. The land around Korova is high – running around \$6000/acre – this is high when comparing to other regions in the province. We believe this is due to the CFO's, manure to fertilize the land and added value agriculture that the Acme area has. We would argue that CFO's are a great benefit to a community and property values in the area. Korova and its owners are community driven and this is front of mind when we look to grow our business.

Future Expansion – Any expansion Korova looks for will go through the regulators such as NRCB, Alberta Environment, and Kneehill County. We will look to grow our business as the next generation joins the family business. But it will be done only in the most responsible way for our family, our team members, and the community. We believe in growing as a business and we hope that this isn't viewed by the community as a hinderance but rather an exciting opportunity for everyone. We want to see Acme/Linden flourish, we want to see the schools continue to grow (or at least maintain) the occupancy, we want to see banks, grocery stores, coffee shops exist in our communities. This can only be accomplished if we continue to see business in the area. We want to be part of that story.

Should you have any other questions/concerns please don't hesitate to contact Doug Price at 403-809-5866 or Kendra Donnelly at 403-546-4392.

We appreciate your time in reviewing our rebuttal.

Sincerely,

Doug Price  
President  
Korova Feeders Ltd.