

March 13, 2020

NRCB Application LA20001
Applicant: P&H Wessels Farms Ltd.

Attention: Adria Snowdon, Approval Officer
Natural Resource Conservation Board
100, 5401 1st Avenue South
Lethbridge, AB, T1J 4V6.

RE: P&H Wessels Farms Ltd., NW-33-007-26 W4M & SW 4-8-26 W4M

In response to your February 19, 2020 request for input from directly affected parties on the proposed Confined Feeding Operation. We have the following concerns and would like to know how they will be addressed:

Water

- The McBride Aquifer is not limitless; there are reports of wells going dry in low water years resulting in people hauling water for domestic use. What assurance is there that removing 30-50 thousand gallons of water per day from the McBride Aquifer for a CFO, will not affect those who rely on the water for domestic use. If over pumping results in wells going dry who will pay for water hauling?
- In both NRCB applications LA190004 and LA20001 the applicant has falsely indicated they have all the Water Act approvals. Yet it is clear from the board correspondence on the LA19004 approval, that the NRCB is well aware that this is not true. Why is the NRCB being willfully blind to these violations? The NRCB is well aware the CFO is diverting water without any approvals, so why would the NRCB approve an expansion of an operation currently breaking the law?
- A water quality study in 2013 found the McBride Aquifer, was the source of drinking water for a large number of rural residents, and it had elevated nitrate levels. What are the cumulative effects on increasing manure loading over the aquifer already having high nitrates? Who is monitoring the aquifer for CFO related changes? Why would the NRCB allow increased manure loading with no thought to the consequences?

We note that the permeability testing was done in January 2019, in an area outside the pens. How was the ground thawed and how was the water for conductivity measurements kept running? Is sampling in January representative of real permeability?

The letter from Wood on Page 25 of 35 commenting on the existing pens makes reference to bore hole #PW3-19. How can this hole which is not in the vicinity of the existing pens be used to make conclusions about soil quality in the existing pens? Again with reference to bore hole PW3-19 the soil profile indicates sand and gravel at 2-3 meters, yet Wood concludes that there is "an equivalent to 41 m of naturally occurring material having a hydraulic conductivity of 1×10^{-6} cm /S". How can both be true?

The soil profiles indicate the existing pens are on pit run gravel, and appear to drain into Hay coulee (a spring floodway) and wells. Why would you ignore the three most northerly pens full of cattle and pretend they are not part of a CFO? What kind of ongoing monitoring will be required to determine how the CFO is effecting groundwater? Why are you refusing to add groundwater quality monitoring as a condition of operation despite it being requested by AEP and AHS?

Manure

- The current practice in the area is to spread manure when the ground is frozen, or when a snowfall / rain event are imminent. Will this be allowed to continue? Is there an expectation that this will be monitored by the neighbors?
- Who will look at and monitor the cumulative effects of increased manure spreading?
- Manure is currently being stockpiled on NE 32 -7-26 W4M, why is there no soil testing in the area used to stock pile and store manure?
- The application lists the soil type as "Thin Black" for purposes of manure loading yet the soil profiles indicate clay and gravel. Is there supporting documents to indicate there is Black soil in this area?

Roads

- MD of Willow Creek maintenance of Twp. Rd 80 has deteriorated over the years, with the CFO increasing north / south traffic across TWP Rd. 80 will there be increased provision for road maintenance and snow removal? Farm infrastructure in close proximity to the south side of the road with prevailing north east winds will result in significant snow drifts.

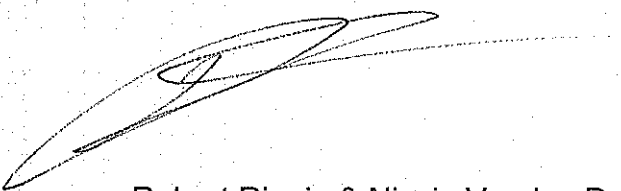
Dead Cows

- The standard practice in this area is to dispose of dead animals in shallow pits. With a 2% loss rate there will be approximate 100 dead animals. Will NRCB be

monitoring to ensure these animals will not be disposed of in shallow pits over an already stressed vulnerable aquifer?

We note that in your approval of LA19001 you indicate that if there were concerns with accumulative effects of water contamination and manure disposal from CFO, the MD of Willow Creek should rezone the area through Municipal Development Plans and Land Use Bylaws. Please explain how this is accomplished in the 30 day notification period. I would think that most municipal governments expect the NRCB to regulate and safeguard CFOs, and would be surprised to know the NRCB expects Municipal Government to regulate the long term effects.

We hope that Alberta Agriculture, Alberta Environment, and Alberta Health Services take the necessary steps to ensure all Albertans have access to safe clean drinking water and that the McBride aquifer, a very valuable commodity, is not lost to the priority of industry. If you require any further information, please contact us at [REDACTED] or [REDACTED].



Robert Rippin & Niesje Vanden Dool
SW-33-7-26
[REDACTED] Fort Macleod, AB
T0L 0Z0

Cc:/

Alberta Environment
Alberta Health Services
MD of Willow Creek