

From: [Fiona Vance](#)
To: [Laura Friend](#)
Cc: [Bill Kennedy](#); [Nathan Shirley](#); [Francisco Echegaray](#); taryl.abt@specialareas.ab.ca
Subject: NRCB RFR Ference Land and Cattle RA24030 - material from Field Services
Date: October 3, 2024 9:09:39 AM
Attachments: [RA24030 Response Kevin Clark 22 Jul 24 Redacted.pdf](#)
Sensitivity: Confidential

Good morning,

I am legal counsel for NRCB Field Services and the Approval Officer in this request for review ("RFR").

We take no position on the outcome of this RFR. To assist the Board, I am attaching one document:

1. Mr. Clark's response to application RA24030 dated July 22, 2024.

Along with his response, Mr. Clark also sent a video of 1'28" in length. The video is too data-heavy to send over e-mail. I have provided Ms. Friend, Manager, NRCB Board Reviews, with a link to the video. If you would like to view the video, kindly contact Ms. Friend at laura.friend@nrcb.ca

I have blind-copied Craig Ference (for Ference Land and Cattle Corp.) and Kevin Clark.

Regards,

Fiona N. Vance (*she/elle*)
Chief Legal Officer - Operations, NRCB
Fiona.Vance@nrcb.ca
(780) 999-3197

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From: [Nathan Shirley](#)
To: [Crystal Powers-Sanford](#)
Subject: Fwd: Double F Feedlot
Date: Monday, July 22, 2024 2:37:40 PM
Attachments: [IMG_5789.mov](#)

Soc for Ference.

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: July 22, 2024 at 1:52:48 PM MDT
To: Nathan Shirley <Nathan.Shirley@nrcb.ca>
Subject: Double F Feedlot

Nathan Shirley, Although this request issued by NRCB is not a genuine one and is simply required for the rubber stamp of approval, the following response is to reiterate previous concerns that were no
Caution! This message was sent from outside your organization. Allow sender<<https://mail-cloudstation-us-west-2.prod.hydra.sophos.com/mail/api/xgemail/smart-banner/07238a473f227e60833280f0e429b17c>> | Block sender<<https://mail-cloudstation-us-west-2.prod.hydra.sophos.com/mail/api/xgemail/smart-banner/5bc50dd39413b116d3d1e3fa9ae3b638>>
sophospsmartbannerend

Nathan Shirley,

Although this request issued by NRCB is not a genuine one and is simply required for the rubber stamp of approval, the following response is to reiterate previous concerns that were not addressed by NRCB for initial 6000 head approval and to highlight NRCB negligence and incompetence regarding Double F Feedlot for legal purposes.

Prior to this expansion, there were numerous attempts to highlight issues with Double F Feedlot. We sent in soil and water samples showing evidence of manure contamination. The test results show excessively high faecal coliform content and exceed the unit of measure demonstrating very high levels of manure in the wetland. We requested third party water and soil sampling and professional drainage assessments. NRCB ignored these requests and contamination of the wetland continues.

NRCB provisions for confined feeding of cow-calf herds during drought conditions are clear and state that

- manure must be managed according to Agricultural Operation Practices Act requirements
- areas used for cow-calf feeding must not pose a risk to surface water or groundwater quality.

On March 26, 2024, video evidence was sent to Fraser Grant showing that contaminated water would begin to overflow into our wetland with another snow or rain fall, yet once again, nothing was done. Kevin Seward, NRCB Manager of Compliance was also contacted about the non compliance of Double F Feedlot, and no action has been taken to eliminate wetland contamination.

For comparison:

In July 2020, Thorlakson Feedyards catch basins were almost overflowing, as reported by a neighbour. An emergency order was issued by Kevin Seward the next day as he determined they could overflow. When Kevin Seward was called to address the active and abundant overflow of contaminated water from Double F Feedlot, it was ignored. What is the rationale for Kevin Seward's double standard when it comes to enforcement? No orders or directives have been published by NRCB.

Alberta Environment Emergency Response line was called June 27 (reference number 429655) and nothing was done.

The attached video and latest water report has been sent to Special Areas at their request.

Further correspondence will be made to address NRCB negligence in this matter.

Kevin Clark