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OUR FILE No. 158693 /RCS

YOUR FILE No. 1701

February 2, 2021

EMAIL TO laura.friend@nrcb.ca


Manager, Board Reviews
 Natural Resources Conservation Board

Attention: Laura Friend

Dear Madam:

**Re: Notice of Adjournment Application
 in relation to NRCB Application No. 1701**

We act for the SR1 Concerned Landowner Group (“SCLG”). On January 28, 2021, the Board issued a Notice of Adjournment Application in relation to NRCB Application No. 1701. The SCLG supports the Stoney Nakoda Nations’ application for an adjournment of the public interest hearing. At the hearing of the Application, the SCLG will refer to Appendix G-3 in Ex. 159 at PDF pg.382. The Preconstruction Schedule is as follows:

		Springbank Off-Stream				
Activity ID	Activity Name	Remaining Duration	Start	Finish	Predecessors	Successors
Springbank Off-Stream Storage Project		1244	31-Aug-21	26-Jan-25		
Preconstruction		286	31-Aug-21	13-Jun-22		
A1000	Regulatory Approval	0	01-Dec-21*			A3130, A3140
A1010	Land Acquisition	0	13-Jun-22*			A4220, A4320
A1020	Tender Period	237	31-Aug-21*	24-Apr-22		A1030
A1030	Project Award	0		25-Apr-22	A1020	A1040
A1040	Mobilization	10	25-May-22	08-Jun-22	A1030	A2060, A2050, A3150, A3160, A3210, A4010, A4120, A4202, A2090, A2000, A2080, A4080, A2010

This exhibit was filed on December 18, 2020 after the Board's Prehearing Conference on December 3, 2020. The Preconstruction Schedule is premised upon a Regulatory Approval by December 1, 2021. The SCLG notes that the Board could accommodate the 3 month adjournment being requested by the Stoney Nakoda Nations and schedule the hearing to start on June 22, 2021 rather than March 22, 2021 and still meet the Regulatory Approval date in Stantec's Appendix G-3 Schedule. A decision from the Board based on a June 22 hearing start date would certainly be available prior to December 1, 2021. I would also note that SCLG's counsel, Mr. Secord, is involved in a Court of Queen's Bench trial from April 26 to May 21, 2021 so a hearing start date in early June would be acceptable to the SCLG.

As a final note, the final preliminary design report was only provided by AT to the parties on December 18, 2020 which was after the NRCB Pre-hearing Conference on December 2, 2020 and after the NRCB PHC Decision Report was issued on December 10, 2020. The following Appendices referred in Ex. 159 were just posted to the NRCB's website on February 2, 2021 (today):

- Appendix B (Hydrology) Ex. 173.
- Appendix C (Hydraulics) Ex. 174.
- Appendix D (Geotechnical) Ex. 175-178.
- Appendix E (Structural) Ex. 179.
- Appendix F (Civil) Ex. 180.

An adjournment of the hearing to June 2021 would also provide for further time to review these new voluminous exhibits.

Yours truly,

ACKROYD LLP

Original signed by

RICHARD C. SECORD
RCS/rcs