

Feb 26th, 2021

Natural Resources Conservation Board
250 – 5th St SW
Calgary, AB
T2P 0R4

Attention: Laura Friend, Manager, Board Reviews

Re: Scott Wagner SR1 NRCB Submission SR1 Design, Safety and Risk (Risk Management)

Please find below the submissions for the SR1 Review.

SR1 Design, Safety and Risk

Risk Management

Last fall the GOA informed us that they needed access for an Indigenous Archaeological Assessment. We had our lawyers negotiate the document contents which is standard practice. As with all GOA engagement to date the Indigenous Study was a process not needing Landowner input. To preface this issue, our wider family has dealt with numerous pipeline easements, road access, and utility agreements over the years. I also have personal experience in Indigenous Archaeological Assessments through one of my companies. In the GOA Archaeological agreement, they implied shovel digging of six small holes consistent with my previous experience. When Stantec showed up with contractors to start on the Archaeological dig they arrived with a back hoe, a team of individuals and promptly began digging in a frog pond 100 meters in front of our house. This hole was much larger than expected and the location was confusing: why would First Nations have camping, burial, or other activity in a seasonal creek bed, especially since this meander typically has up to 3 ft of standing water most of Spring, Summer and Fall. We called Stantec to discuss the size of the hole and ask to have the location fenced to keep the cattle from creating a mud hole in the spring. Fencing in these matters is standard remediation practice. For those not familiar with cattle they like fresh dirt and have no trouble creating a mud hole, all in record time. We were told by Stantec there was no remediation plan (which is contractual in the agreement). Stantec further elaborated that the GOA had not provided instructions on how to deal with remediation. After what appeared to be a flurry of phone calls with the work team, all work stopped. Stantec later phoned and stated they would get back to us shortly! Well, now going on four months and ... crickets. While this Archaeological fiasco is a small issue in the overall scheme (other than for the frogs which probably don't view things quite the same), it does raise questions of GOA and Stantec competence to ensure environmental stewardship, contractual adherence, and consultation. As Landowners we have never had a problem of this magnitude with any pipeline, utility company, road contractor, or oil & gas company. This problem could easily be mitigated by these Risks by:

- Adhering to the Environmental standards which in our experience all Oil & Gas Companies Comply

- Communicate / work with the Landowners just as Pipeline Companies have done
- Monitor and Manage Contractors in the same manner we have experienced with Utility Companies
- Engage with stakeholders on locations
 - Why the first hole in a frog pond puzzles me
 - Just Asking as I don't pretend to be an expert: Is this the logical place to find Indigenous Artifacts?

The GOA intends on raising Highway 22 by 40 ft. Highway #1 exit to Highway #22 going south has been modified and re-modified, and yet again re-modified and yet Semi-trucks are still found in the ditch flipped over from winds hitting them from the west. It is not clear to me how public safety will improve with a road up 40 ft: my high school science and experience building wind turbines says this massive causeway will provide perfect "lift" for Semi rollovers! Maybe the GOA has a solution to this, however they have yet to find a solution to the 22 exit that is meters away ... having spend millions on modifications!

Sincerely,

Scott Wagner

Reference Material

- GOA Archaeological Assessment Document – Please reference the GOA as this is a confidential contract. We give permission to the NRCB for review, however the GOA will need to provide permission prior to disclosure.