

BY E-MAIL ONLY

August 17, 2018

Carmen Mawson

PURE ENVIRONMENTAL WASTE MANAGEMENT LTD.

APPLICATIONS NO. 1907859, 1907864, 1907866

STATEMENT OF CONCERN NO. 31084

Dear Carmen Mawson:

You are receiving this letter because you filed a statement of concern about Applications No. 1907859, 1907864, 1907866. The Alberta Energy Regulator (AER) has reviewed your statement of concern, along with the applications, the applicable requirements, and other submissions or information about the applications. The AER has decided that a hearing is not required under an enactment, or necessary, to consider the concerns outlined in your statement of concern.

In its review of your concerns, the AER considered the following:

- Pure has applied to drill three wells that it intends to use in the subsurface disposal or storage of fluids. The proposed wells are not located on your lands, and are about 1840 meters from your residence, and 630 meters from the boundary of your property. Your lands will not be impacted by any setbacks associated with the wells.
- Regarding your concerns about use of and impacts to fresh water sources, Pure has indicated that it intends to use saline non-potable water sources. In addition, your concerns about the use of fresh water for cavern development do not relate to and are outside of the scope of the current well applications.
- Noise associated with the drilling and construction activities is temporary in nature. When the wells are operational, Pure must comply with AER Directive 038: Noise Control. Your concerns about increases in noise arising out of the expansion of Pure's facility operations are also outside of the scope of the current well applications. If Pure intends to apply for facility approval, it must carry out a noise

impact assessment to ensure that Directive 038 requirements will be met. Pure must address operational noise complaints if any arise in accordance with Directive 038.

- As the wells are intended for disposal, there will be no flaring and limited venting at the well sites. It is an AER requirement that any venting at the sites must not result in offensive hydrocarbon odours outside the site boundary that, in the opinion of the AER, are unreasonable either because of their frequency, their proximity to surface improvements and surface development, their duration, or their strength.
- In regards to your concerns about light pollution from the site, Pure has indicated that lighting will be designed and constructed so light is directed to maximize lighting efficiency at the site and minimize light travelling off site. Lighting during drilling operations will be temporary in nature. Given the above, the distance of your residence to the site, and the vague and general manner in which you have raised this concern, there is insufficient information to demonstrate that the light exposure you are concerned with is of a sufficient magnitude so as to possibly directly and adversely impact you.
- Regarding your concerns about spill containment, runoff, and surface impacts, Pure must comply with AER requirements which are protective of the surface environment. This includes waterbody and surface structure setback requirements, requirements for secondary and primary containment in the storage of fluids, and fluid control requirements at the wellhead.
- Regarding your concerns about notification provided by Pure about the applications, the AER has reviewed the application materials, including Pure's comprehensive responses to the concerns and questions outlined in your statement of concern, and is satisfied that Pure has met, and in some cases exceeded, the applicable application notification and consultation requirements in AER Directive 056: Energy Development Applications and Schedules.
- As these wells are intended to be part of a larger project involving the disposal and storage of Class 1a/1b fluids and solids into underground formations and/or caverns, and you have expressed concerns in the development, the AER has requested Pure provide you direct notification of all future applications related to this project in addition to all other notification and consultation requirements that may be required.

inquiries 1-855-297-8311
24-hour
emergency 1-800-222-6514

Based on the above, your concerns are addressed to the AER's satisfaction, and you have not demonstrated that you may be directly and adversely affected by the applications. The AER has decided to issue the applied-for licences and this is your notice of that decision. Copies of the licences are attached. Under the *Responsible Energy Development Act* an eligible person may file a request for a regulatory appeal on an appealable decision. Eligible persons and appealable decisions are defined in section 36 of the *Responsible Energy Development Act* and section 3.1 of the *Responsible Energy Development Act General Regulation*. If you wish to file a request for regulatory appeal, you must submit

your request in the form and manner and within the timeframe required by the AER. You can find filing requirements and forms on the AER website,
<http://www.aer.ca/regulating-development/project-application/regulatory-appeal-process>.

If you have any questions, contact Yvonne Chow by e-mail at Yvonne.Chow@aer.ca.

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Sincerely,

<Original signed by>

Jon Keeler
Acting Director, In Situ Authorizations

Attachments: Licences (3)

cc: Donovan Baillie, Pure Environmental Waste Management Ltd.
AER SOC Coordinator
AER Bonnyville Field Centre