

BY E-MAIL ONLY

August 17, 2018

Ronald Robert Brawn

PURE ENVIRONMENTAL WASTE MANAGEMENT LTD.

APPLICATIONS NO. 1907859, 1907864, 1907866

STATEMENT OF CONCERN NO. 31120

Dear Ronald Robert Brawn:

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 340 meters from your residence, and 270 meters from the boundary of your property. Your lands will not be impacted by any setbacks associated with the wells.
- Regarding your concerns about groundwater and water well impacts, Pure must comply with AER requirements which are protective of the groundwater sources. All surface casing must be set and cemented to a depth that is below the base of groundwater protection, which will protect even the deepest aquifer. Surface casing depth for disposal wells will be set at 195 m. In addition, Pure will implement a groundwater monitoring system.
- Your concerns about impacts to local roads and highways, traffic volumes and safety are outside of the jurisdiction of the AER, and should be addressed with the municipality or Alberta Transportation, as applicable. In any event, it is unlikely that

the subject applications will give rise to any significant increase in traffic and road use. Pure has also stated it will have posted signage, speed limits and clear visibility for incoming and outgoing traffic to and from the site.

- 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.
- 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. 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.
- You have stated a general concern about ‘property value devaluation’, however you have not provided any particulars or further information to explain or support this claim. The AER notes again that your lands will not be impacted by any setbacks arising from the applications, and that pre-existing industrial development already exists in proximity to your lands and oil and gas development is common in this area.
- There is no H₂S associated with the proposed wells, and therefore no requirement for a site specific emergency response plan. Pure is required to have a corporate emergency response plan which addresses emergency response in the unlikely event of an incident. As the wells are intended for disposal, there will be no flaring or incineration, 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.
- Regarding your concerns about environmental impacts Pure must comply with AER requirements which are protective of the surface environment. This includes waterbody setback requirements, requirements for secondary and primary containment in the storage of fluids, and fluid control requirements at the wellhead.
- Your concerns about animals are vague and general in nature, and it is unclear how the cattle you refer to might be affected by the well applications, and how this might directly and adversely affect you. In addition, the well sites will be fenced and locked to prevent animals from entering the site.

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

- 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.
- 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.

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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.

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