

BY EMAIL ONLY

March 8, 2019

Carmen Mawson

PURE ENVIRONMENTAL WASTE MANAGEMENT LTD.

APPLICATION NO. 1911539

STATEMENT OF CONCERN NO. 31288

Dear Carmen Mawson:

You are receiving this letter because you filed a statement of concern about Application No. 1911539. The Alberta Energy Regulator (AER) has reviewed your statement of concern, along with the company's application, and all applicable requirements and other submissions or information about the application. The AER has decided that a hearing is not required to consider the concerns outlined in your statement of concern.

In our review of your concerns, we considered the following:

- Pure Environmental Waste Management Ltd. (Pure) will be required to comply with *Directive 038: Noise Control* and address operational noise complaints if any arise. A Noise Impact Assessment was completed and deemed satisfactory by the AER.
- Regarding your concerns relating to flaring and venting odours, there will be no flaring at the site and Pure does not anticipate any significant odours/emissions associated with operations. In addition, Pure has indicated that all fluid and product transfers will be contained and transferred within a closed system. Pure must comply with the requirements in *Directive 060: Upstream Petroleum Industry Flaring, Incinerating, and Venting*, including requirements specifically aimed at preventing off-lease odours.
- Your concerns relating to traffic volumes are outside the jurisdiction of the AER and should be addressed by Alberta Transportation or the local municipality, as applicable.

- Climate change is an issue that is beyond the scope of the application, relates to and is addressed by policy decisions of the Government of Alberta, and is outside the jurisdiction of the AER.
- Your concerns about fresh water use are premature and outside the scope of the application. Pure must apply for any necessary water dispositions in future applications. In addition, Pure has indicated that saline formations will be its first choice for source water for cavern mining.
- The AER has reviewed the application materials and is satisfied that Pure has met the notification and consultation requirements relating to the application and the development of the site as set out in *Directive 058: Oilfield Waste Management Requirements for the Upstream Petroleum Industry*. It also provided additional application materials to you beyond what was required by *Directive 058*. .

Based on the above, the AER has concluded that it is not necessary to hold a hearing before making a decision on the application. The AER has issued the applied-for approval and this is your notice of that decision. A copy of the approval is attached.

All AER- regulated parties must comply not only with the conditions of their authorizations, but with all of the AER's regulatory requirements. To ensure industry compliance the AER has developed its *Integrated Compliance Assurance Framework*, which embodies the three main components of all effective compliance assurance programs, those being education, prevention, and enforcement. You can find out more about how the AER verifies industry compliance and responds to noncompliance here: <https://aer.ca/regulating-development/compliance/compliance-assurance-program>.

You may file a regulatory appeal on the AER's decision to issue the approval if you meet the criteria within section 36 of the *Responsible Energy Development Act*. Filing instructions and forms are on our website under Regulatory Appeal Process.

If you have any questions, contact Yvonne Chow at Yvonne.Chow@aer.ca.

Sincerely,

<Original signed by>

Rob Cruickshank
Director, Business Process

Enclosure: Approval (1)

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