

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Rural Municipality of Tache
PROPOSAL NAME: Lorette Water System Upgrading
CLASS OF DEVELOPMENT: Two
TYPE OF DEVELOPMENT: Water Development and Control
CLIENT FILE NO.: 5279.00

OVERVIEW:

The Proposal was received on July 16, 2007. It was dated May 22, 2007. The advertisement of the Proposal was as follows:

“A Proposal has been filed by the Rural Municipality of Tache for the construction and operation of an upgraded groundwater supply system to provide water for Lorette. The groundwater supply system would include a well system, pumphouse and reservoir within the community at the location of the present pumphouse. The upgraded system would supply up to 294 cubic decametres of water per year. Approximately half of the water would be obtained from existing municipal wells in the carbonate aquifer. The remainder of the water would be supplied from a new well in the sandstone aquifer. Construction of the new components of the system is proposed to begin in the late fall of 2007.”

The Proposal was advertised in the Steinbach Carillon on Thursday, July 26, 2007 and in the Winnipeg Free Press on Saturday, July 28, 2007. It was placed in the Main, Millenium Public Library (Winnipeg), Manitoba Eco-Network and Jake Epp Public Library (Steinbach) registries. It was distributed to TAC members on July 20, 2007. The closing date for comments from members of the public and TAC members was August 31, 2007.

COMMENTS FROM THE PUBLIC:

Seine-Rat River Conservation District We at the Conservation District do not have any major concerns with this project but we do wish to enquire as to the sealing of the unnecessary wells in Lorette. Once the water system upgrade is in place, many private wells in Lorette will no longer be needed. It is our hope that these wells would be properly sealed once the project has been completed.

Disposition:

Additional information on plans for the sealing of unneeded wells was requested from the proponent.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Manitoba Conservation – Sustainable Resource Management Branch The following comments are provided by Manitoba Conservation regarding the proposal:

- Approval is subject to necessary Crown Lands Act allocation where applicable. In respect of Crown Land, no land tenure is granted by way of an environmental approval. Applicant must apply for applicable Crown Lands Act Permit/Lease which will be subject to the standard Crown Land and Property Agency review process.
- There should be no connections on the water distribution system that also connect to a private well.
- Any petroleum storage tanks and their installation must comply with the Manitoba Fire Code per the Office of the Fire Commissioner (due to the small size of the proposed tank, the Petroleum Regulation will not apply.)

Disposition:

These comments were provided to the proponent's consultant for information. They can also be addressed as licence conditions.

Manitoba Water Stewardship – Planning and Coordination

Manitoba Water Stewardship has reviewed the above proposal and submits the following comments for your consideration:

- The proponent needs to apply for a water rights licence or perhaps a change is required to an existing licence.
- Other than including a two page FAX from John Friesen to Cochrane Engineering with a rough sketch of proposed well construction and a note on the bottom indicating a pumping test for 3 hours at 450 Igpm, the reviewer is left to guess at what actually will be done in terms of well construction and testing of the well once it is completed. There is no firm commitment in the proposal which states what testing will be carried out on the 10-inch well once it is completed – how long will the test be and at what expected rate. This needs to be provided in the proposal. It is noted that the groundwater consultant on the project indicated a maximum pumping rate of 450 Igpm could be expected from this well.
- The sketch referred to above indicates that the annular space between the 16-inch and 10-inch casings will be backfilled with sand. Sand will reduce the interconnection between the Carbonate and Winnipeg aquifers but is not a suitable grout when trying

to construct a well so that it separates the two aquifers. The annular space should be cement grouted for at least 20 m above the Winnipeg Formation.

- There is no mention of the surface seal around the 16-inch casing. This casing should also be properly grouted to prevent water movement in the annular space.
- It is mentioned that water from the two existing wells completed into the Carbonate aquifer will be blended with water from the Winnipeg Formation well to provide a “potable water meeting standards”. The quality of water from the Carbonate aquifer wells has not been provided nor has there been any calculation given of what the quality of the blended water will be at a 50/50 ratio to show that it will in fact meet “standards”. This information needs to be provided.
- If part of the reason for drilling a well into the Winnipeg Formation is to eliminate bacterial contamination of the raw water supply then I fail to understand how continuing to pump the two existing wells completed in the Carbonate aquifer will not continue to introduce contaminated water into the system. There is no discussion of well-head protection to ensure that these wells will not also become contaminated at some time in the future, if this has not already occurred.
- There is no discussion of sealing or otherwise dealing with existing private wells when municipal water is provided to these residences. If the wells are to be abandoned they should be properly sealed as part of this project. As well, if the system expands in future years to other residences with private wells there needs to be an assurance that these wells will also be dealt with in a proper manner.
- It is stated that the proposed withdrawal of water from each of the two aquifers is “very insignificant in relation to the substantial sustainable yields of these aquifers”. This is a very definitive statement but there has been no information, references or analysis provided to back up the statement. How do the proponents know what the sustainable yields of the aquifers are in this area? In addition, there has been no analysis provided which would indicate what pumping impacts may be on adjacent wells or, for that matter, the locations of other wells in the area on either aquifer which may be impacted by this project.
- The proposal appears to indicate that the pumping test on the new well completed into the Winnipeg Formation will only be for 3 hours, apparently at 450 Igpm. Industry and engineering standards would suggest that after the well is completed a step-drawdown test should be conducted to evaluate the actual well capacity at varying pumping rates followed by a constant rate pumping test carried out at a rate approximately 10-20% greater than the expected pumping rate. This constant rate pumping test should be of a duration no less than 24 hours and should be interpreted by a suitably qualified hydrogeologist.
- It was indicated that the pumping test on the test well was for 1.5 hours with pumping done by air. Water samples were collected and submitted for analysis. Since the metals content of these samples may be significantly impacted by the introduction of air during pumping, the concentrations of some metals given in this analysis is questionable. As well, it was not indicated if this sample was field filtered to remove suspended solids which may have been present due to the turbulent pumping method on a newly drilled well.

Disposition:

Additional information was requested to address these comments. A number of the comments concerning well construction and testing will be addressed in Water Rights licensing requirements.

Historic Resources Branch No concerns.

Mines Branch No concerns.

Intergovernmental Affairs and Trade – Community Planning Services Branch

The land within the study area falls within the Village of Lorette. The subject land has been the site of an existing well and pumping station for the past 32 years. The proposal is for the expansion of the existing system. The new system will service 275 existing properties and an additional 950 residents. The land is designated “Open Space” according to the RM of Tache Development Plan and zoned “OR” according to the RM of Tache Zoning By-law. The proposed water system upgrading is in keeping with the intent and policies identified in the RM of Tache Development Plan and requirements of the RM of Tache zoning by-law. The report further notes that the impact on the surrounding residential development is minimal.

As such, our office has no concerns with respect to the proposal.

Infrastructure and Transportation – Highway Planning and Design Branch

Manitoba Infrastructure and Transportation (MIT) has reviewed the abovementioned proposal as requested in a letter dated July 30, 2007. The Department has no major concerns but notes the following:

Permits are required from this Department (under the Highways and Transportation Act) for any proposed driveway accesses (or modifications thereto) or installation of any structure within the control area adjacent to Provincial Road (PR) 207 (within 38.1 metres (125 feet) from the edge of the road right-of-way) or Lorette access roadway (Avenue St. Amant).

Contacts in these regards are provided for accesses and structures within Highway and Control Areas and Highway Right of Way.

Disposition:

This information was forwarded to the proponent’s consultant for information.

Canadian Environmental Assessment Agency I have completed a survey of federal departments with respect to determining interest in the project noted above. I can confirm that the project information that was provided has been reviewed by all federal departments with a potential interest. Based on the responses to the federal survey, the

application of the *Canadian Environmental Assessment Act* (the Act) will be required for this project. Western Economic Diversification has advised that it may be providing funds for the project and, therefore, it will be required to conduct an environmental assessment under the Act.

Environment Canada and Health Canada have provided comments in the form of the attached letters. Health Canada is prepared to provide specialist advice upon request and is also interested in participating in the provincial review of the project.

As the project requires a review under both provincial and federal environmental assessment legislation, a joint process under the Canada-Manitoba Agreement on Environmental Assessment Cooperation will be required. We should discuss how this joint process should proceed as soon as possible. In the mean time, please forward the federal review comments to the proponent for response as part of the TAC review process.

Disposition:

Federal TAC comments were provided to the proponent for information.

ADDITIONAL INFORMATION:

Additional information was requested on September 6, 2007 to address public and TAC comments. The attached response dated October 1, 2007 was received on October 2, 2007. This information addresses many of the public and TAC comments. Remaining comments can be addressed either through Environment Act licence conditions, or through conditions provided through approvals through Manitoba Water Stewardship. In particular, well testing and construction details will be specified by Manitoba Water Stewardship. This also can be recognized through Environment Act licence conditions.

PUBLIC HEARING:

No requests were received for a public hearing, and public comments have been addressed through the additional information and through licence conditions. Accordingly, a public hearing is not recommended.

RECOMMENDATION:

All comments received on the Proposal have been addressed through additional information, provided to the proponent's consultant for information or can be addressed as licence conditions. Therefore, it is recommended that the Development be licensed under The Environment Act subject to the limits, terms and conditions as described on the attached Draft Environment Act Licence. It is further recommended that enforcement of the Licence be assigned to the Eastern Region.

PREPARED BY:

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September 5, 2007 Updated January 17, 2008

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