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## **Little Smoky Fracking Water Application Reveals Alberta's Missing Cumulative Effects Management in Duvernay Region**

Alberta's lack of cumulative effects management is revealed in Shell's recent application to use up to 5 million m<sup>3</sup> per year of lake water for oil and gas fracking operations in west central Alberta. Alberta Wilderness Association (AWA) requests in its [Statement of Concern](#) that the Alberta Energy Regulator (AER) deny Duvernay Play-Based Regulation applications until concerns about significant water and land impacts in the Little Smoky River watershed, where the water use would occur, are resolved.

"AWA is concerned that fresh water use by multiple oil and gas fracking operations in the Little Smoky Duvernay region exceeds the Alberta government's capacity to manage impacts to water resources and aquatic ecosystems," says Carolyn Campbell, AWA conservation specialist. "For World Water Day, March 22 2015, AWA asks that further water approvals wait until a credible, precautionary water management plan is in place for the Little Smoky and other nearby affected watersheds."

Cumulative effects management triggers and limits have not been set for upland, wetland and water course disturbance in west central Alberta. Without these limits, approvals under the Alberta Energy Regulator's Duvernay play-based regulation (PBR) pilot will cause more regional land disturbance and water sedimentation risks, which will likely harm important fish species populations in the Little Smoky watershed, such as arctic grayling (a species of special concern) and threatened bull trout.

Shell's Iosegun Lake water and fish impact assessment is based on modelling that attempts to overcome significant data gaps. The establishment of field-data-supported triggers and limits for water quantity and quality should be led by the provincial government rather than an energy company, and should precede approval of this application.

Although water use under this application will occur several townships east of the Little Smoky caribou range, the AER launched the Duvernay PBR pilot without setting net surface disturbance limits that are urgently required for recovery of endangered woodland caribou. Applications under the regional PBR should not proceed without ensuring that endangered species' habitat requirements are met.

Under the AER's narrow definition of 'directly and adversely affected', environmental groups such as AWA are excluded from standing in these applications. Standing rules must be reformed to improve Alberta's accountability and transparency on important environmental concerns.

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