



ALBERTA WILDERNESS ASSOCIATION

*"Defending Wild Alberta through  
Awareness and Action"*

Director, Northern Region  
Alberta Environment  
Regulatory Approvals Centre  
Main Floor, Oxbridge Place  
9820 – 106 Street  
Edmonton, AB T5K 2J6

July 11, 2008

Dear Sir/Madam,

**Re: Grande Cache Coal's application to develop, operate, and reclaim the No. 8 mine project**  
**ERCB application no. 1566814**  
**EPEA application no. 004-155804**  
**Water Act file no. 00227000**

As you know, Alberta Wilderness Association (AWA) has had a continuous interest since the mid-1960s in the area that Grande Cache Coal (GCC) currently leases and operates in. As a province-wide public interest organization, AWA has both individual and organizational members who live and work in the area. As well, staff and executive members of AWA have visited the area and have used it recreationally over the decades.

### **Reclamation Work of the Highest Standard**

AWA recognizes the land which Grande Cache Coal leases, including that which is currently proposed for development, as being significant for local wildlife populations of both flora and fauna. Open-pit mining is extremely disturbance intensive, permanently altering an area at the landscape level. As such, reclamation of Mine 8 must be of the highest standard to ensure the long-term viability of wildlife species, local watersheds, and a cradle-to-near cradle lifecycle for the mining project. Reclamation work must be carried out using the best-quality information, technology and reclamation practices available. Post-operation wildlife monitoring must be conducted, with studies long enough in time to ensure effectiveness of reclamation work. Where necessary, further reclamation work must be conducted to secure long-term wildlife habitat values. During the lifecycle of Mine 8, reclamation work must be monitored carefully to ensure that it progresses along the schedule proposed, so as to not overstep the security fund as discussed below.

Further to reclamation, AWA is concerned that in the Mine 8 reclamation plan, GCC mentions the establishment of a road through the bottom of the Westridge pit to the Sheep Creek breaker, which could be used as a shortcut for hauling coal in future development such as Mine 16. AWA takes this comment as indication that GCC intends to develop Mine 16 in the future. Mine 16 is situated on Caw Ridge, an area of significant wildlife importance, including migration routes for endangered caribou and key habitat for Alberta's largest population

of mountain goats. AWA has consistently and will continue to object to the development of Caw Ridge and Mine 16.

### **Adequate Security Fund**

AWA makes note that in the Application for Amendment, Grande Cache Coal does not submit an estimated cost calculation for reclamation of the No. 8 mine nor the amount which they propose to post as a reclamation security. Section 8.10 states that “GCC will submit a reclamation security cost calculation under separate cover to AENV and will post the agreed-upon amount in a manner satisfactory to AENV prior to the issuance of the Amendment of EPEA Approval 155804-00-02.”

AWA is very concerned that the collected security be of sufficient value to cover the **complete and true cost of reclamation at the time of greatest ground disturbance**. As GCC proposes a staged reclamation plan, with reclamation work beginning once individual pits and dumps are completed and in some cases prior to other sections being disturbed, costs for complete reclamation at any one time during the lifecycle of the mine will fluctuate. Therefore AWA recommends that the security be equal to or greater than the funds required for the period of time when the true and complete cost of reclamation work necessary will be at its greatest and should include sufficient funds to cover inflation and potential rises in the cost of the work. During the time of the Mine 8’s lifecycle, should the costs of reclamation become greater than the security fund, whether due to falling behind the reclamation schedule while disturbance work continues or substantial increases in cost of work, GCC must be required to place more funds into the security fund to cover the increase.

This will guarantee that costs for reclamation do not fall upon Alberta’s citizens through work needed to be carried out by the Alberta government should Grande Cache Coal go into receivership before reclamation work is completed, as was the case with its predecessor, Smoky River Coal. AWA also requests that the amount of the security and calculation method be made public for reasons of transparency and public interest prior to it being finalized, with an opportunity for public scrutiny and comment.

Sincerely,  
ALBERTA WILDERNESS ASSOCIATION



Chris Wearmouth  
Conservation Specialist

cc:  
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