



Alberta Wilderness Association

## The AER Should Not Have Approved Suncor's High-Risk Operational Plan for McClelland Wetlands



Photo © J. Hildebrand

Alberta Wilderness Association (AWA) is asking the Alberta Energy Regulator (AER) to reconsider and revoke its approval of Suncor's Operational Plan for the McClelland Lake Wetland Complex (MLWC).

A new report published by AWA highlights seven major concerns with Suncor's Operational Plan — a plan which is supposed to guarantee that Suncor can protect the unmined half of the wetland complex from harm, while they mine the other half.

The Fort Hills Oil Sands Project is an existing Suncor-owned oil sands mine north of Fort McMurray, that began operations in 2018 and is proposed to

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According to a 2002 decision from the Alberta Energy and Utilities Board, Suncor is permitted to mine roughly half of the wetland complex so long as the ecological diversity and function of the unmined portion is maintained. In December 2021, Suncor submitted a required Operational Plan to outline how they intend to protect the unmined portion of the wetland complex.

AWA contracted the services of two boreal peatland experts — Dr. Lorna Harris and Dr. Kelly Biagi — to review the Operational Plan and determine whether it would guarantee the protection of the unmined MLWC. Our report shows that the Operational Plan cannot guarantee the protection of the unmined wetland complex.

Suncor's mitigation strategy poses a significant risk of irreversible damage to the unmined portion of the McClelland Lake Wetland Complex, and therefore, it should not have been approved by the AER.

“We believe that Suncor's proposed activities may violate the conditions of the project's Water Act approvals”, says Phillip Meintzer, AWA Conservation Specialist. “What Suncor is proposing is a high-risk water management experiment and not a plan that can guarantee protection. It should not have been approved by the AER.”

The Operational Plan contains many uncertainties and deficiencies which pose a serious risk to the sustainability of the area.

These concerns include:

1. Not addressing potential saline contamination of the fresh surface water and groundwater that sustains these wetlands;
2. Lack of modelling for potential impacts to groundwater quality;
3. Insufficient observational data to support the water flow models;
4. Uncertainty and risk with proposed “conceptual stage” plan for a large underground wall and water pipeline system to be inserted, operated and reclaimed within the wetland complex without harming the unmined portion;
5. Assumption of negligible impacts from predicted water level changes;
6. Unrecognized impacts to the ecological integrity and functionality of the patterned fen; and

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In November 2022, AWA was notified that the AER had already approved the Operational Plan via Letter of Authorization (LoA) on Sept. 9, 2022. The conditions in the Letter of Authorization do not meaningfully address the concerns highlighted in our expert review.

Given the high level of risk associated with the activities proposed by the Operational Plan, AWA is asking the AER to reconsider and revoke their approval of Suncor's Operational Plan pursuant to Section 42 of the *Responsible Energy Development Act*. We also ask for Suncor to commit to halting all attempts to mine within the watershed of the vitally important, irreplaceable, and irrecoverable McClelland Lake Wetland Complex.

The full report is available from AWA's website at the link below:

<https://albertawilderness.ca/awa-report-a-review-of-suncors-mcclelland-lake-wetland-complex-operational-plan-for-the-fort-hills-oil-sands-project/>

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