

While Northback's current proposal requests 1500 m³ of water, their previous applications for a commercial mine development required almost 375,000 m³ in permanent and temporary licensed allocations³². Mining is considered a consumptive use of water, creating tailings contaminated with heavy metals and chemicals that cannot be returned to the river – this represents volumes of water lost from an already overused river system. The presence of tailings on the landscape also creates additional threats, as the risk of contaminating nearby waterbodies increases. This is evident from the numerous incidents in recent years reported on the AER compliance dashboard that have occurred at existing operations whereby coal wastewater was discharged into the environment when storage ponds failed, flooded, or were inadvertently drained.

Conclusion

Based on a review of the applicable legislation, Northback's current applications do not address the necessary legal requirements. As Northback has indicated in their submission, if the AER chooses to approve their applications, it is likely they will try to develop a commercial coal mine. This means that a potential impact of issuing Northback's requested CEP, TDL, and Deep Drilling Permit in the near term will result in a full commercial development later, associated with all the negative environmental and human health impacts discussed here, which is not in the public interest. Further, the extent of the transboundary pollution from the Elk Valley Coal mines must also inform the AER's decision. Although outside of the AER's jurisdiction, this previously unknown threat impacts the ecosystems and populations along the Eastern Slopes and across Southern Alberta's watersheds. Considering all the pressures the SSRB is already under, it is unacceptable to incur additional and unnecessary pollution or potential use at the basin's headwaters. All of the research presented here indicates that the impacts of coal mining are far from localized. It challenges the AER's basis for determining which interested parties deemed to be 'directly and adversely affected' in matters such as these, and to restrict those who are considered to have full standing in this proceeding (or any related proceeding) to only those living directly adjacent to the site is evidentially not informed by the best available research.

AWA requests the AER reject all of Northback's applications and remove the 'advanced project' status from Grassy Mountain.

Sincerely,

Alberta Wilderness Association



Kennedy Halvorson
Conservation Specialist

³² Benga Mining Limited. 2017. [Grassy Mountain Coal Project, Notice of Application](#).