

**MTS Webmail**

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**CEC Submission**

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**From :** [Redacted]  
**Subject :** CEC Submission  
**To :** Crocker, Peter <cec@mb.ca>

Fri, Mar 24, 2023 11:59 AM  
📎 1 attachment

Hello Peter,

Please accept my submission as attached.

Thanks,

Darryl Speer

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 **CEC.docx**  
13 KB

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March 24, 2023

Manitoba Clean Environment Commission  
305-155 Carlton Street  
Winnipeg, MB. R3C 3H8

Attention: Commission Members

Re: Sio Silica Proposed Vivian Silica Sand Project File: 6119

The RM of Springfield(RMSF) has now submitted their S.S Papadopoulos Peer Review of the proposed Sio Vivian Silica Sand Project, just authorized for public release, March 21, 2023. This after refusing numerous requests-citing "confidentiality as per legal advice"

CAO Draper advised the CEC, February 13, 2023, that "to maintain a neutral position with respect to the proposed project, the RM of Springfield has elected not to provide pre-hearing written evidence, to not present opening and closing arguments and to not provide testimony of expert witness(es)"

The background of this report is that it was contracted to S.S Papadopoulos, March 1, 2022, for \$20,000.00 by RMSF resolution No.22-084. The commitments made by Council then was for this report to be presented to the public for their input upon completion(May 2022). This was not done.

We were informed by CAO Draper at the RMSF Council meeting February 21, 2023, that Christopher Neville, Chief Hydrogeologist S.S Papadopoulos, would represent RMSF at the CEC hearings. NOT DONE. Instead a part time employee, a Mr. Mark Prydun, without appropriate credentials or experience was tasked to 'audit' but not engage in the hearing process. His responses to the CEC chair "if there were any questions from the RMSF"- "no questions".

However at the March 1, 2023, hearing Mr. Prydun stunned many with these comments. He complimented Sio's monitoring and impact mitigation plan as "a very sound Document" and stated "the question is can you describe what opportunities might exist for the RM of Springfield to participate in the ground water monitoring and impact mitigation plan process to ensure that we could support our citizens fairly?"(CEC transcript March 1, 2023, page 138). Mr. Prydun clearly had not grasped that this was a key deficiency critiqued consistently by the experts of Sio's witnesses.

This ranks right up there with Mayor Therrien's closing statements at the March 15, 2023 hearing:  
1)" our valuable water resources is of utmost importance to Council"  
2)"all questions and concerns raised about the mining process and activity of Sio Silica must be addressed completely...the Rural Municipality of Springfield will not consider supporting any unproven operations that have the potential to affect the environment, specifically the ground water resources of Southern Manitoba and their protection".

When Mayor Therrien was pressed by constituents at the RMSF Council meeting of March 21, 2023; that the multitude concerns not properly addressed should warrant a reconsideration of the RMSF's "neutral position", he became defensive and would not concede how untenable remaining "neutral" was.

Even the short list of unresolved concerns-each standing alone should be grounds to derail Sio's proposal;

1) Depleting the aquifer sand stock via 10,000+ boreholes

- 2) The unknown impacts to water quality from the impacts of such untested mining(i e. the reinjection of process water).
- 3) The subsidence due to formations collapsing.
- 4) The potential contamination from thousands and thousands of abandoned wells.
- 5) The environmental havoc created by the equipment for drilling and transporting the silica sand for processing.

As ground zero for Sio's project, RMSF has made serious missteps;

- 1) Not having expert engineering and legal representation as did MSSAC for the other eight affected municipalities.
- 2) Attempting to late file the Papadopoulos report as evidence, contrary to CEC guidelines- now contested by SIO's legal demand.
- 3) Non cooperative stance to those who championed the protection of Springfield's ground water and environment from Sio's greivous assault.

I would ask that the CEC recommend a unequivocal denial of Sio's request for a license.

Sincerely,

A handwritten signature in cursive script, appearing to read "Darryl Speer".

Darryl Speer