



**Agriculture and Resource Development**

Water Branch

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May 4, 2021

Mr. Dennis LeNeveu  
Via email: denmorley@gmail.com

Dear Dennis LeNeveu:

Thank you for correspondence regarding your concerns with the operation of CanWhite Sands Corporation wells near Vivian, Manitoba, particularly as it relates to The Groundwater and Water Well Act.

I note that an Environment Act proposal for the sand extraction, along with supporting information, has not yet been made by CanWhite Sands Corporation. When an Environment Act proposal is received for the sand extraction process, it will be advertised, placed on the on-line public registry and will undergo the complete environmental assessment and licensing process, including a public review period. This information, once available, may assist in addressing some of your broader concerns including those raised in your most recent email on April 19, 2021. In the meantime, the information you have provided was shared with our colleagues in the Mining, Oil and Gas Branch and with Conservation and Climate's Drainage and Water Rights Licensing Branch and the Environmental Approvals Branch for their information.

Staff in the Groundwater Management Section have reviewed the information that you have provided and offer the following responses regarding each of your concerns related to The Groundwater and Water Well Act. We have included both your question (in italics) and our response.

- 1. We have evidence from the CWS well drilling reports obtained from Manitoba Groundwater Section that the triple tube airlift wells developed by CWS since 2017 are constructed to withdraw sand and water from the sandstone water and return excess water to the carbonate aquifer.*

Please note that the well reports provided to you previously contain information provided by the driller to the department. The reports were printed directly from the provincial database of water wells. The information in the database is added and updated on an ongoing basis.

The well reports contain information on the materials used to construct the well. Reports do not include pumping, piping or other information for delivering water, or sand to

the surface. Information supplied to the department by CanWhite Sands Corporation specifies that the water is returned to the sandstone and not the carbonate aquifer. It is the understanding of the department that some wells were constructed in such a manner (triple tube) as to monitor the water level in the carbonate aquifer during testing of the sandstone aquifer to ensure that the pumping from the sandstone does not negatively impact the carbonate aquifer.

- 2. We have evidence that operation of CanWhite Sands Corporation wells has contaminated and adversely affected groundwater quality in both the carbonate and sandstone aquifers.*

Thank you for sharing the list of well owners with concerns regarding their well water quality. Our records show that issues related to iron do occur naturally in this area. The department would be pleased to discuss concerns related to well water quality with well owners. Well owners with concerns about well water quality can contact the department directly at ([groundwater@gov.mb.ca](mailto:groundwater@gov.mb.ca)) or 204-945-0002.

- 3. We have evidence that injection of excess water into the carbonate aquifer will unsustainably draw down the sandstone aquifer.*

Information supplied to the department by CanWhite Sands Corporation specifies that water pumped from the sandstone aquifer from testing sand production is returned to the sandstone aquifer. The proposed process will return the water to the same aquifer from which it originates.

- 4. Often the report of well construction and sealing was combined in one report issued long after well construction occurred. Combining the construction and sealing reports in this fashion is a violation of the Manitoba Groundwater and Water Well Act.*

The construction and sealing information is reported by the driller on separate forms, except in the instance when the well is sealed soon after drilling and then the report can be combined on a single form. Well drillers have a 45-day window from the completion of the well to submit a report. Once received by the department, the information provided by the driller for a single well is entered into the provincial water well database and all information for a well is associated with a single record in the database. This information may include completion and sealing information. Printouts from our database, such as those sent to you previously, combine all information for a single well into one printout. The printouts clearly separate information on the well construction from the well sealing, including the dates that these activities took place.

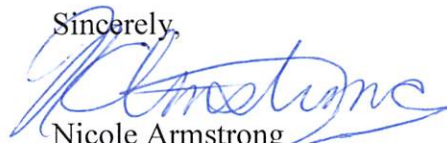
- 5. We have evidence the well identification tags were not affixed to at least four of the wells at Centre Line Road SW19-10-8E.*

Your report indicates that well 199982 (BRU 82-5 / BH 6-18) did not have a well tag affixed to it. The report from the driller indicates that the tag was not attached to the well casing as is permitted under Section 48(b) of the Well Standards Regulation. The department has followed-up with the well driller and with CanWhite Sands Corporation to re-affirm the requirements regarding well identification tags. Since the wells in question have now been sealed, there is no opportunity to further inspect these wells for non-compliance.

6. *We have evidence that well covers were not properly emplaced on many CanWhite Sands Corporation unattended wells.*

The photograph (Figure 4 from your report) shows covers on the wells. These wells are now sealed and therefore additional inspection of the well cover is not possible. The province has followed up with the drilling company and with CanWhite Sands Corporation to re-affirm the need for secure caps on all wells.

Thank you again for sharing your concerns with us. I hope that this information is helpful. I encourage you to contact the Environmental Approvals Branch at [EABDirector@gov.mb.ca](mailto:EABDirector@gov.mb.ca) and to follow the public registry at <https://www.gov.mb.ca/sd/eal/registries/index.html> for further information on the CanWhite Sands Corporation project.

Sincerely,  
  
Nicole Armstrong  
Director

cc: Graham Phipps