March 18/19

NRCB Application LA 19004
Applicant: P&H Wessels Farms Ltd.
Attention: Adria Snowdon, Approval Officer
Natural Resource Conservation Board
100, 5401 1st Avenue South
Lethbridge, AB, T1J 4V6.

RE: P&H Wessels Farms Ltd., NW-33-007-26 W4M & SW 4-8-26 W4M

In response to your February 20, 2019 request for input from directly affected parties on the proposed Confined Feeding Operation. We have the following concerns and would like to know how they will be addressed:

Water

- The McBride Aquifer is not limitless; there are reports of wells going dry in low water years resulting in people hauling water for domestic use. What assurance is there that removing 200,000 to 300,000 liters of water per day from the McBride Aquifer for a CFO, will not affect those who rely on the water for domestic use. If over pumping results in wells going dry who will pay for water hauling or drilling of new wells? Will P & H Wessel put deposits, insurance or irrevocable letters of credit in place to insure payment to neighbors if water issued arise??

- A water quality study in 2013 found the McBride Aquifer, was the source of drinking water for a large number of rural residents, and it had elevated nitrate levels. What are the cumulative effects on increasing manure loading over the aquifer already having high nitrates? Who is monitoring the aquifer for CFO related changes?

- Do the Wessels have a water License? If so is it for 200,000 to 300,000 liters per day?

- Is P & H Wessel Farms willing to pay for water testing on wells and dugouts that could be affected before final approval and afterward??

We note that the permeability testing was done in January 2019. Was the ground thawed and how was the water for conductivity measurements kept running? Is sampling in January representative of real permeability?
The letter from Wood on Page 25 of 35 commenting on the existing pens makes reference to bore hole #PW3-19. How can this hole which is not in the vicinity of the existing pens be used to make conclusions about soil quality in the existing pens? Again with reference to bore hole PW3-

19 the soil profile indicates sand and gravel at 2-3 meters, yet Wood concludes that there is “an equivalent to 41 m of naturally occurring material having a hydraulic conductivity of 1 X10-6 cm /S”. How can both be true?

The soil profiles at the new proposed expansion site on NW33-7-26 indicate very thin clay layer (some locations less than 2 feet) over sand and gravel. How is that suitable for CFO pens? This does not appear to meet the soil requirements of Section 9.5 of AOPA. The catch basin appears to be at a higher elevation then the pens. Assuming the top clay layer of soil is removed to lower the basin level, the result will be a basin on sand and gravel over an unprotected aquifer.
The soil profiles indicate the existing pens are on pit run gravel, and appear to drain into Hay coulee (a spring floodway) and a well. What kind of ongoing monitoring will be required to determine how the CFO is effecting downstream water?

Manure

- The current practice in the area is to spread manure when the ground is frozen, or when a snowfall / rain event are imminent. Will this be allowed to continue? Is there an expectation that this will be monitored by the neighbors?
- Who will be looking at and monitoring the cumulative effects of increase manure spreading?
- It is our observation that local CFO pens are not cleaned regularly to a catch basin, instead the manure builds up in significant volume in each pen until it is directly spread to fields. As a result the permeability under the pens and the direct transfer of manure to the aquifer is an important concern not addressed by this application.
- Also is he going to be keeping records of manure spreading, as a records is suppose to be kept when deal with that much manure.
- The application lists the soil type as “Thin Black” for purposes of manure loading yet the soil profiles seem to indicate clay and gravel. Is there supporting documents to indicate there is Black soil in this area?

Roads

- MD of Willow Creek maintenance of Twp. Rd 80 has deteriorated over the years, with the CFO increasing north / south traffic across TWP Rd. 80 will there be increased provision for road maintenance and snow removal? Farm infrastructure in close proximity to the south side of the road with prevailing north east winds will result in significant snow drifts.

Dead Cows

- The standard practice in this area is to dispose of dead animals in shallow pits. With a 2% loss rate there will be approximate 100 dead animals. Will NRCB be monitoring record to ensure these animals will not be disposed of in shallow pits over an already stressed vulnerable aquifer.

Fire

- What Fire protection plan will P & H Wessel Farms have? As in the pass there has been fires. The last fire they had our fence was cut and he never came to fix it or talk to us about it.

Dealing with P & H Wessels in the past, when their pens of cattle have gotten out in the past has proven to be difficult. One time in particular I had phoned Peter on his cell phone and I had told him that I had just watched a pen of cattle leave his place heading east toward hiway 810 just as the school busses were coming home. They got to the hiway and headed south where a Transalta truck pulled over and got them to go down township road 75A. Peter wasn't home he said he was in Lethbridge but reassured me that they were not his and I should drive over and call him back when I knew what the brand was and what colour ear tag they had in them. They were his.
There is always pens of cattle getting out of his place, and he doesn't seen to care if they are on the hiway or in our fields. He is never in a hurry to come and get them or get them off the hiway. I couldn't imagine if he had more cattle at their place what would happen, all I know it would be very unsafe, for those who live close and also for people travelling on Hiway 810.

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