NO 1 - REQUEST FOR REVIEW: RA24001 / Ference Land & Cattle Corp. (FLCC)	
Filed By:	**Kevin Clark**
Deadline for RFRs:	May 3, 2024
Date RFR received:	May 1, 2024
Status of Party as per Decision Summary:	Directly Affected Party

Attn: NRCB Board

Re: Application RA24001 Ference Land and Cattle Corp

Please find the following as my application to request a board review.

a) You will find clear and concise statements of facts relevant to the application below.
b) This application is being made on the grounds that NRCB failed considerably to conduct a proper investigation. Additionally, NRCB publicised falsely made accusations using my name and altered my questions which are available in the public domain.
c) The board needs to reconsider the status as my land has, is and will continue to be contaminated and based on past experiences, trespassed upon.
d) The nature of the damage being done to my land is contamination that has resulted prior the permitting and the continued future contamination that will occur.
e) The remedy sought is for 1)third party testing of ground water, surface water, and soil testing on my property and on FLCC land that they have been spreading manure on for the last 20 years and for this information to be made publicly available. 2) reclamation of my property from the FLCC contamination.
f) Kevin Clark Box [redacted] Altario, AB T0C0E0 email: [redacted]
g) A representative will be involved if the following are not addressed.

The following concerns satisfy part a) of this application. The other concerns are also expected to be addressed specifically, clearly and concisely by the NRCB.

1) When the NRCB came out to investigate the complaint from Special Areas in 2016, why was it not discovered at that time that this operation was not legally permitted?
2) Based on this application, it appears that the NRCB labels FLCC as compliant in all CFO rules and regulations. How is this the case when they argue they were not aware of the need for permitting?
3) This feedlot has been in operation since 1985. How have they been feeding 8000 to 12000 head of feeder cattle without proper permitting? They state the excuse that they "didnt know". First, how is this an acceptable reason? Secondly, how has the NRCB not conducted any audit to reveal the lack of permitting earlier? Thirdly, why has the NRCB not required ground water testing, surface water testing or soil testing for an operation that has had no permitting. I expect a third party to be brought in to test both ground water and surface water.

   Due to NRCB's inability to conduct a proper investigation, we had to hire an agronomist to test the soil. Not surprisingly, the field near the culvert draining FLCC manure shows excessively high phos levels. Results are attached. **The soil samples demonstrate that the approval officers decision did not adequately address an issue and is one of several reasons the decision must be reviewed by the board**.

For perspective, in 2016, the FLCC cut our fence on the south side to gain unauthorized access to a culvert that drains onto our property. They drove their track hoe onto our land, destroying standing crop to dig out a culvert to facilitate drainage of their contaminated water onto our property.

4) When the NRCB came out this spring, how was the direction of run off water determined? Please provide exact details on how this was conducted. What professional mechanism was used?
5) In Appendix B1: These questions and concerns I raised have been modified without consent and labelled with my name. They must be amended immediately with my exact wording or my name must be removed.
6) The 2016 complaint was not made by myself as stated by Ference's. This is a serious, incorrect, accusation labelled with my name in the public domain that needs to be removed immediately.

I expect a point by point response to each of these concerns immediately along with a thorough Board review.

Kevin Clark

Report Number: C24113-10130
Account Number: 06445

To: ACHIEVE LAND AND CROP SCIENCES
307 MAIN ST
EATONIA, SK S0C 0H0

Attn: MATTHEW MCKINNON

A & L Canada Laboratories Inc.

2136 Jetstream Road, London, Ontario, N5V 3P5
Telephone: (519) 457-2575 Fax: (519) 457-2664

C24113-10130

For: CLARK FARMS
E 8-34-2-W4

Reported Date:2024-04-24 Printed Date:Apr 25, 2024

SOIL TEST REPORT

Sample Number	Legal Land Descpt:	Depth	Lab Number	Organic Matter	Phosphorus - P ppm Bicarb	Phosphorus - P ppm Bray-P1	Potassium K ppm	Magnesium Mg ppm	Calcium Ca ppm	pH	pH Buffer	CEC meq/100g	Percent Base Saturations % K	% Mg	% Ca	% H	% Na
1	CULVERT	6	84146	8.9	54 VH	133 VH	1229 VH	1381 VH	3370 L	7.8		34.7	9.1	33.2	48.6		9.6
2	CULVERT	6	84147	6.6	92 VH	229 VH	702 VH	717 H	6000 H	8.1		38.2	4.7	15.7	78.6		1.2
3	BENCHMARK	6	84148	17.9	12 M	17 L	393 VH	578 VH	2140 M	6.9	6.9	18.0	5.6	26.8	59.6	6.3	1.6

Sample Number	Sulfur S ppm	Sulfur S lbs/ac	Nitrate Nitrogen NO3-N ppm	Nitrate Nitrogen NO3-N lbs/ac	Zinc Zn ppm	Manganese Mn ppm	Iron Fe ppm	Copper Cu ppm	Boron B ppm	Soluble Salts mmhos/cm	Saturation %P	Aluminum Al ppm	Saturation %Al	K/Mg Ratio	ENR	Chloride Cl ppm	Sodium Na ppm
1	1131 VH	2036	12 M	22	8.2 H	27 M	91 VH	2.3 H	2.1 H		18 H	127	0.0 G	0.27	102		764 VH
2	440 VH	792	3 VL	5	85.6 VH	44 H	132 VH	0.7 M	5.2 VH		19 H	30	0.0 G	0.30	79		106 H
3	239 VH	430	2 VL	4	10.1 VH	28 M	90 VH	1.7 H	1.1 M		2 L	173	0.0 G	0.21	112		68 H

W VL = VERY LOW, L = LOW, M = MEDIUM, H = HIGH, VH = VERY HIGH, G = GOOD, MA = MARGINAL, MT = MODERATE PHYTO-TOXIC, T = PHYTO-TOXIC, ST = SEVERE PHYTO-TOXIC

SOIL FERTILITY GUIDELINES (lbs/ac)

Sample Number	Previous Crop	Intended Crop	Yield Goal	Lime Tons/Acre	N	P2O5	K2O	Mg	Ca	S	Zn	Mn	Fe	Cu	B

* Recs are based on building nutrients to a level to maintain soil health. Banding and/or precision placement techniques can be utilized to increase fertilizer efficiency.
* If this report contains soil in excess of 7500 ppm Ca it may or may not effect the calculated Cation Exchange Capacity. Excessive seed placed fertilizer can cause injury.
The results of this report relate to the sample submitted and analyzed. All results are released based on acceptable QC data.
* Crop yield is influenced by a number of factors in addition to soil fertility.
No guarantee or warranty concerning crop performance is made by A & L.

Results Authorized By: BWood **Beth Wood, Agronomist**

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Soil analysis done by: A & L Labs

Fertilizer Report

Client name: Clark Farms
Phone number:
Crop:

Field: Benchmark (E 8-34-2 W4)
Date Sampled:
Target Yield: bu/ac

Soil analysis report

Sample number	Land description	Depth (inch)	Organic Matter	P lb/ac	K lb/ac	Mg lb/ac	Ca lb/ac	pH	CEC meq/100g	% K	% Mg	% Ca	% H	% Na	S lb/ac	N lb/ac	Zn lb/ac	Mn lb/ac	Fe lb/ac	Cu lb/ac	B lb/ac	% Sat P	Al lb/ac	K/Mg ratio	Cl lb/ac	Na lb/ac
	0	6	17.9	30.6	707.4	1156	4280	6.9	18	5.6	26.8	59.6	6.3	1.6	430	4	20.2	56	180	3.4	2.2	2	346	0.21	0	136

Available N: 129.3

Very low | Low | Medium | High | Very high

Crop requirement for target yield

Crop	N	P	K	S	Ca	Mg	Zn	Mn	Cu	B	Fe
Wheat	2.12	0.95	1.47	0.32	0.18	0.23	0.005	0.007	0.001	0.001	0.010
Canola	2.74	1.3	2.05	0.86	0.9	0.45	0.008	0.009	0.012	0.006	0.020
Peas	2.43	0.92	2.98	0.17	3.5	0.3	0.002	0.009	0.002	0.001	0.013
Barley	1.5	0.33	1.72	0.14	0.22	0.1	0.002	0.009	0.001	0.001	0.004
Canaryseed	1.5	0.75	2.02	0.25	0.22	0.1	0.002	0.009	0.001	0.001	0.004
Lentils	2.1	0.9	2.57	0.17	2.9	0.4	0.004	0.009	0.002	0.002	0.014

Remarks:

Fertilizer recommendation

Crop		N	P	K	S	Ca	Mg	Zn	Mn	Cu	B	Fe	Cl
Wheat	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Canola	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Peas	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Barley	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Lentils	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Canaryseed	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0

* Red - needs attention
*Green- don't need attention

Fertilizer Blend recommended:
____ *kg/ac*

Thank you for your business & support !

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Soil analysis done by: A & L Labs

Fertilizer Report

Client name: Clark Farms
Phone number:
Crop:

Field: Away from Culvert (E 8-34-2 W4| 4)
Date Sampled:
Target Yield: bu/ac

Soil analysis report

Sample number	Land description	Depth (inch)	Organic Matter	P lb/ac	K lb/ac	Mg lb/ac	Ca lb/ac	pH	CEC meq/100g	% K	% Mg	% Ca	% H	% Na	S lb/ac	N lb/ac	Zn lb/ac	Mn lb/ac	Fe lb/ac	Cu lb/ac	B lb/ac	% Sat P	Al lb/ac	K/Mg ratio	Cl lb/ac	Na lb/ac
	4)	6	8.9	239.4	2212	2762	6740	7.8	34.7	9.1	33.2	48.6	0	9.6	2036	22	16.4	54	182	4.6	4.2	18	254	0.27	0	1528

Available N: 84.3

Very low | Low | Medium | High | Very high

Crop requirement for target yield

Crop	N	P	K	S	Ca	Mg	Zn	Mn	Cu	B	Fe
Wheat	2.12	0.95	1.47	0.32	0.18	0.23	0.005	0.007	0.001	0.001	0.010
Canola	2.74	1.3	2.05	0.86	0.9	0.45	0.008	0.009	0.012	0.006	0.020
Peas	2.43	0.92	2.98	0.17	3.5	0.3	0.002	0.009	0.002	0.001	0.013
Barley	1.5	0.33	1.72	0.14	0.22	0.1	0.002	0.009	0.001	0.001	0.004
Canaryseed	1.5	0.75	2.02	0.25	0.22	0.1	0.002	0.009	0.001	0.001	0.004
Lentils	2.1	0.9	2.57	0.17	2.9	0.4	0.004	0.009	0.002	0.002	0.014

Remarks:

Fertilizer recommendation

Crop		N	P	K	S	Ca	Mg	Zn	Mn	Cu	B	Fe	Cl
Wheat	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Canola	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Peas	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Barley	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Lentils	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Canaryseed	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0

* Red - needs attention
*Green- don't need attention

Fertilizer Blend recommended:
____ *kg/ac*

Thank you for your business & support !

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Soil analysis done by: A & L Labs

Fertilizer Report

Client name: Clark Farms
Phone number:
Crop:

Field: Near Culvert (E 8-34-2 W4
Date Sampled:
Target Yield: bu/ac

Soil analysis report

Sample number	Land description	Depth (inch)	Organic Matter	P lb/ac	K lb/ac	Mg lb/ac	Ca lb/ac	pH	CEC meq/100g	% K	% Mg	% Ca	% H	% Na	S lb/ac	N lb/ac	Zn lb/ac	Mn lb/ac	Fe lb/ac	Cu lb/ac	B lb/ac	% Sat P	Al lb/ac	K/Mg ratio	Cl lb/ac	Na lb/ac
	0	6	6.6	412.2	1264	1434	12000	8.1	38.2	4.7	15.7	78.6	0	1.2	792	5	171.2	88	264	1.4	10.4	19	60	0.3	0	212

Available N: 51.2

Very low | Low | Medium | High | Very high

Crop requirement for target yield

Crop	N	P	K	S	Ca	Mg	Zn	Mn	Cu	B	Fe
Wheat	2.12	0.95	1.47	0.32	0.18	0.23	0.005	0.007	0.001	0.001	0.010
Canola	2.74	1.3	2.05	0.86	0.9	0.45	0.008	0.009	0.012	0.006	0.020
Peas	2.43	0.92	2.98	0.17	3.5	0.3	0.002	0.009	0.002	0.001	0.013
Barley	1.5	0.33	1.72	0.14	0.22	0.1	0.002	0.009	0.001	0.001	0.004
Canaryseed	1.5	0.75	2.02	0.25	0.22	0.1	0.002	0.009	0.001	0.001	0.004
Lentils	2.1	0.9	2.57	0.17	2.9	0.4	0.004	0.009	0.002	0.002	0.014

Remarks:

Fertilizer recommendation

Crop		N	P	K	S	Ca	Mg	Zn	Mn	Cu	B	Fe	Cl
Wheat	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Canola	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Peas	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Barley	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Lentils	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0
Canaryseed	0 bu/ac	0	0	0	0.0	0.0	0.0	0	0.0	0.0	0.0	0.0	0

* Red - needs attention
*Green- don't need attention

Fertilizer Blend recommended:
____ *kg/ac*

Thank you for your business & support !