

NO 2 - REQUEST FOR REVIEW: RA24051 / Rimrock Cattle Company Ltd.

Filed By:	Erin and Garrett Davis and Downsview Farm Ltd.
Deadline for RFRs:	September 11, 2025
Date RFR received:	September 11, 2025
Status of Party as per Decision Summary:	Directly Affected Parties

Request for Board Review (RFR) of an Approval Officer CFO Application Decision

Instructions

1. **Eligibility.** Only those parties listed as “directly affected” in the approval officer’s CFO application decision or those parties requesting reconsideration of their status (see page 2, section #3), are eligible to request a Board review (RFR).
2. **Jurisdiction.** The Board’s jurisdiction in Alberta to review a decision by an approval officer is set out in sections 20(5), 22(4), and 23(3) of the [Agricultural Operation Practices Act](#) (AOPA).
3. **Deadline.** The NRCB must receive an RFR by the deadline specified in the approval officer’s decision cover letter. The AOPA Administrative Procedures Regulation does not allow consideration of time extension requests or late submissions.
4. **Public Documents.** RFRs and attachments are public documents.
5. **Submission.** Submit this form and any attachments by email to Laura Friend, Manager of Board Reviews at laura.friend@nrcb.ca. Contact her at 403-297-8269 for assistance.

1. Confined Feeding Operation (CFO) Application Details

NRCB Application No.	RA24051
Name of Owner/Operator or Operation	Rimrock Cattle Company Ltd.
Type of application (<i>if known</i>)	<input checked="" type="checkbox"/> Approval <input type="checkbox"/> Registration <input type="checkbox"/> Authorization
Location (<i>legal land description</i>)	Se-34--29-25-W4
Municipality	Kneehill County, Alberta

2. Status Declaration

I hereby request a Board review of the approval officer’s decision:
(*You must check one*)

- ☐ I am the owner/operator
- ☐ I represent the owner/operator
- ☐ I represent the municipality
- ☒ I am listed as a directly affected party in the approval officer’s decision
- ☐ I am **not** listed as a directly affected party in the approval officer’s decision and therefore I am requesting my status be reconsidered (see page 2, section #3)

3. Request for Reconsideration by Board of “Not” Directly Affected Status

Instructions. Only those parties **not** listed as directly affected in the approval officer’s decision are to complete this section.

- The Board can only consider RFRs submitted by "directly affected" parties. Those parties not listed as directly affected in the approval officer’s decision must first request the Board to reconsider their status. If the Board grants a party “directly affected” status, it will then consider their RFR.
- Upon receipt of a CFO application, the approval officer sends a notification letter to the “affected” parties. Affected parties are owners or occupants of land residing within a designated distance from the applied-for CFO. Operators and the municipalities located within the designated distance always have “directly affected” status.
- An affected party must apply for “directly affected” status by providing a written response to the approval officer’s notification letter by the deadline specified. The Board cannot reconsider the status of a party unless they had first responded to the approval officer.
- The approval officer determines the "directly affected" parties to the application based on the responses received and includes this determination in their decision.

My grounds for requesting a reconsideration of my “not” directly affected status are:

4. Request for a Board Review (RFR)

All parties or their representative must complete this section. If you need more space, include an attachment.

- Approval officers must ensure that a CFO application meets the Alberta legislative requirements before they approve it. Conversely, approval officers must deny an application if the requirements are not met. (Sections 20 and 22 of the [Agricultural Operation Practices Act](#) (AOPA)).
- If you believe the **approval officer failed to adequately address an issue** (or issues), state the issue(s) and provide your reasoning below.
- The issue(s) must have been in front of the approval officer at the time they made the CFO application decision; the Board will not consider any new issues.
- Include how the decision affects you, such as any damage or bias you believe would occur to you because of the approval officer's decision.

My grounds for requesting a Board review of the approval officer's decision are:

(Laura Friend comment - the text here extends past the page bottom. The text is duplicated in the attached letter, paragraphs 3 -6).

With the CFO current livestock numbers, their cattle's water requirements would be approximately 119,000 gallons per day (gpd). Their request to move from 14,000 head beef feeder/finisher to 28,000 head of beef finishers, would increase their water requirement to approximately 280,000 gpd. This produces a minimum daily water requirement increase of 135%. This is also not taking into consideration any days with temperatures higher than 25 degrees Celsius, which would then cause cattle's water consumption to approximately double. (These numbers are based on the average daily water requirements as listed on the Government of Alberta livestock tools website. Animal size determined based on the assumption that many of the CFOs cattle are of Angus (British) or Simmental breeding. These breeds have been classically known to start in a feeder program with weights ranging from 700 lbs to 800 lbs. which would result in a daily water requirement of approximately 7 gpd. These breeds could then finish out in a feedlot with weights ranging from 1250 lbs to 1600 lbs, increasing their water requirement to a minimum of 10 gpd. A final weight of 1250 lbs were utilized in calculating gpd for this letter, as to not overestimate, since exact data of cattle housed at the CFO are unknown and not publicised.)

The Rimrock Cattle Company currently holds a License to Divert Water from the Government of Alberta (License number 00466770-00-00 Expiry Date March 16, 2046) in which it utilizes water pumped from the Kneehill Creek to "... divert up to 156,892 cubic meters of water annually from the source of water for agricultural feedlot purposes." The License also states that, "The Licensee shall divert the water authorized by this license only when there is sufficient water flow in the source of water to meet or exceed the Red Deer River Water Conservation Objective... from April to October (during the proposed May to September irrigation season)". This License to Divert Water was obtained, from our understanding, as a need to gain access to an additional water supply for their cattle's consumption, since their existing groundwater supply is insufficient. Since obtaining the License to Divert Water, the CFO's water availability appears to be currently adequate for the time being, but we are concerned about the increase of water consumption this expansion would require and its resulting effects on local groundwater supply, the future environmental impact, and its cumulative effects on water quality and water availability in the years to come.

Our farm is located directly East of the CFO We manage a cow/ calf operation where we calve

5. Board Action Requested

If the Board grants a review of the approval officer's decision (either an approval, denial, cancellation, amendment, or deemed permit), only the "directly affected" parties are eligible to participate (see section #3). A review will be in the form of either a hearing or a written review.

If the Board grants a review, I would like it to:

- ☒ Reverse the approval officer's decision
- ☐ Amend or vary the approval officer's decision

If the Board decides to grant a review on a permitted decision, it may decide to amend or vary the permit terms and/or conditions.

Are there any new conditions, or amendments to existing conditions, that you would like the Board to consider?

Existing conditions: concerned about the increase of water consumption this expansion would require and its resulting effects on local groundwater supply, the future environmental impact, and its cumulative effects on water quality and water availability in the years to come.

6. Contact Information of Person Submitting the RFR

Name	Garrett & Erin Davis
Street/Box Address	[REDACTED]
Town/City/Postal Code	Acme
Legal Land Description	Se-34--29-25-W4
Telephone Number	[REDACTED]
Email Address	[REDACTED]
Date	09/09/2025

7. Contact Information of Legal Counsel or Representative (if applicable)

Name	
Address	
Telephone Number	
Email Address	

Downsview Farm Ltd. (Garrett & Erin Davis)

Acme, AB
TOM OAO

September 11, 2025

Re: Application RA22026
Rimrock Cattle Company Ltd.
Middle of Section 28-29-25-W4

Attn: Laura Friend, Manager, Board Reviews Natural Resources Conservation Board (NRCB)

We are writing to you in response to the request to review the NRCB approval officer's decision, as a directly affected party of the Rimrock Cattle Company Ltd. regarding their application to expand their confined feeding operation (CFO) at section 28-29-25-W4M. The application states that the CFO is applying to expand from their current 14,000 head operation of beef feeder (7,000 head) and beef finisher (7,000 head) operation, to an exclusively 28,000 head beef finisher operation.

Please find in this letter our statement and reasons for concern over the application to expand the CFO. Our main concern involves but is not limited to water quality, quantity, use and consumption because of this proposed expansion.

With the CFO current livestock numbers, their cattle's water requirements would be approximately 119,000 gallons per day (gpd). Their request to move from 14,000 head beef feeder/finisher to 28,000 head of beef finishers, would increase their water requirement to approximately 280,000 gpd. This produces a minimum daily water requirement increase of 135%. This is also not taking into consideration any days with temperatures higher than 25 degrees Celsius, which would then cause cattle's water consumption to approximately double.¹ *(These numbers are based on the average daily water requirements as listed on the Government of Alberta livestock tools website. Animal size determined based on the assumption that many of the CFOs cattle are of Angus (British) or Simmental breeding. These breeds have been classically known to start in a feeder program with weights ranging from 700 lbs to 800 lbs. which would result in a daily water requirement of approximately 7 gpd. These breeds could then finish out in a feedlot with weights ranging from 1250 lbs to 1600 lbs, increasing their water requirement to a minimum of 10 gpd. A final weight of 1250 lbs were utilized in calculating gpd for this letter, as to not overestimate, since exact data of cattle housed at the CFO are unknown and not publicised.)*

The Rimrock Cattle Company currently holds a License to Divert Water from the Government of Alberta (License number 00466770-00-00) in which it utilizes water pumped from the Kneehill Creek to "... divert up to 156,892 cubic meters of water annually from the source of water for agricultural feedlot purposes." ² The License also states that, "The Licensee shall divert the water authorized by this license

¹ Government of Alberta. *Average Daily and Annual Water Requirements*. 2022.
https://www.agric.gov.ab.ca/app19/calc/livestock/waterreq_dataentry2.jsp

² Government of Alberta. "LICENCE TO DIVERT WATER License number 00466770-00-00." March 17. 2021.

only when there is sufficient water flow in the source of water to meet or exceed the Red Deer River Water Conservation Objective... from April to October (during the proposed May to September irrigation season)".³ This License to Divert Water was obtained, from our understanding, as a need to gain access to an additional water supply for their cattle's consumption, since their existing groundwater supply was insufficient.

We are concerned about the increase of water consumption this expansion would require and its resulting effects on local groundwater supply, the future environmental impact, and its cumulative effects on water quality and water availability in the years to come.

Our farm is located directly East of the CFO. We manage a cow/ calf operation where we calve out an average of 250 head of cattle every year. In the winter, we rely on ground water for our cattle's daily water intake requirements. Then in the spring and summer our cattle are moved to pasture located on the Kneehill Creek, which our cattle use as their source of water. Our cattle operation, as well as many other agricultural operations, rely on year-round water sources that will be directly impacted by this expansion.

As stated in the beginning of this letter, water is a major concern of ours with this proposed expansion, as we fear its direct effects on our own cattle operation and our livelihood. While water is our main concern, this expansion would pose further issues regarding increased odour, increased traffic and road use, and an increase of predators (i.e., coyotes). We not only conduct our farm business directly East of the CFO, but we are raising our family on our farm and the concerns listed above would be impactful to our families' daily lives.

We would like our concerns addressed prior to moving forward this application to protect our neighboring environment, our ecosystem, and to ensure a sustainable future for our community and future generations.

Sincerely,

Garrett & Erin Davis
Downsview Farm Ltd.
SE – 34 – 29 – 25 – W4 / SW-35-29-25-W4

[REDACTED]
[REDACTED]

³ Government of Alberta. "LICENCE TO DIVERT WATER License number 00466770-00-00." March 17. 2021.