


From: [Fiona Vance](#)
To: [Laura Friend](#)
Cc: [Lynn Stone](#); [Sean Royer](#)
Subject: RA24051 Rimrock RFR - original responses
Date: September 16, 2025 1:59:03 PM
Attachments: [image001.png](#)
Sensitivity: Confidential

Good afternoon Laura,

NRCB Field Services takes no position on whether the Board should schedule a review of decision RA24051 (Rimrock Cattle Company Ltd.) in response to the two requests for review that were filed.

Following standard practice, and to assist the Board, I am providing you a link to a folder containing the original (June 2025) responses that the authors of the two RFRs submitted for RA24051 :  [Rimrock RFR](#) Please note that unnecessary personal information has been redacted from these responses.

Regards,

Fiona N. Vance (*she/elle*)
Chief Legal Officer - Operations, NRCB
Fiona.Vance@nrcb.ca
(780) 999-3197

Classification: PROTECTED A

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From: [REDACTED]
To: [Lynn Stone](#)
Subject: Re: Application #RA24051 (revision)
Date: Monday, June 2, 2025 7:00:14 PM
Attachments: [REDACTED]

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Lynn,

Attached is my revised letter against the application #RA24051, Rimrock Cattle Company Ltd., Section 28,29,25,W4

Please send me receipt email that you have received my letter and can open and read everything in this attachment.

Leigh Boles
[REDACTED]

June 2, 2025

To: Natural Resources Conservation Board

Attention: Lynn Stone

RE: Application RA24051
Rimrock Cattle Company Ltd
Middle of Section 28-29-25-W4M

I have many concerns about this expansion. Think of how this will affect everyone and everything in the FUTURE.

- My land location is NE 33-29-25-W4
- Where do they plan to get enough water for this feedlot expansion? (I know for a fact that they have had or are having trouble getting enough water for the current 14,000 head) They are currently pumping water out of the Kneehill Creek as well they have drilled 3 water wells. To me the creek seems to me to very very low. We are in a drought, so why are they allowed to deplete the creek for users farther down the line? Is there no restriction on how much and when they can pump? Who is monitoring them to make sure they are abiding by the rules? When they started pumping they needed it for the current 14,000 head, I DO NOT BELIEVE that the Kneehill Creek can provide enough water for another 14,000 head. They should not be able to deplete that water source as there are other farmers that need the Kneehill Creek water for their own livestock. I am also looking to put in an application to also pump out of the Kneehill Creek to have enough water in my 75 year old Dam so that cattle can be graze on my land all summer.
- My other concern is to do with their water as wells. They drilled 3 water wells close to my property that has a Registered Spring Fed Dam since 1951. I believe that their water wells have been drilled into the same spring that feed the dam for the past 75 years. In all the 75 years this dam has never ever been close to empty which it is now? In fact we have always had to maintain an over flow system as it was always too full. Since these wells were drilled the dam has been getting lower and lower. The Dam is the only constant source of water for grazing cattle on this piece of land.
- I filed a complaint with the EPA because of the 75 year old spring fed Dam being empty due to the reasons I explained above. They won't even come out and do a site visit. They said that Rimrock is not the cause of my Dam being empty. How can they say that when I have 75 years of history on this Dam with NO lack of water problems (even in previous drought years) until the feed lot moved in and drilled the 3 water wells? I have the feeling that they are being very one sided for reasons I would really like to know why.
- I am also very concerned that this piece of land that has never been broken up and is totally made up of natural prairie wool grass (wild grass). What happens when my land is contaminated with grasses, weeds, etc.? I would never be able to take it back to its original state as the wild grasses seed variety that exist on this property are not available to buy. This land is and has been very sacred to my family for generation because of its natural state.

- In past dealing with this company and its owners I feel that they seem to work on the analogy of:

“It’s easier to ask for forgiveness than to ask for permission when they want or need something”

For example:

When with the current 14,000 head they ran in major water shortage problems in 2020. They started pumping out of my Registered Water Dam, on my property, WITHOUT my (the owners) permission. They said they had permission from my renters. Doug Price would never allow renters of his land to give permission to anyone to take water or anything else off his land, but thinks its ok for him to ask my renters.

- What is there plan for the disposal of all the manure that an additional 14,000 head will produce?

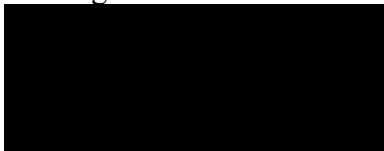
How will this expansion effect:

- Air quality (known fact that the smell is unbearable at times already)
- Land values of neighboring land

I am very concerned that this is NOT good for the future of anyone that will be affected by this. Especially for all those affected by this expansion and their **future** necessities for water.

Yours truly,

Leigh Boles



Neighboring Land Owner

From: [REDACTED]
To: [Lynn Stone](#)
Subject: Application RA24051
Date:
Attachments: [REDACTED]

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Attn: Lynn Stone, Approval Officer for Natural Resources Conservation Board (NRCB)

Please find the attached PDF containing our response for the application RA24051.
Any questions or concerns please contact either Garrett or myself at this email address or via the provided contact information in the response letter.

Thank you,
Erin & Garrett Davis

Garrett & Erin Davis
Downsview Farm Ltd.

June 4, 2025

Re: Application RA24051
Rimrock Cattle Company Ltd.
Section 28-29-25-W4

Attn: Lynn Stone, Approval Officer of the Natural Resources Conservation Board (NRCB)

We are writing to you in response to the courtesy letter notifying the directly affected parties of the application from Rimrock Cattle Company Ltd. 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 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

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

source of water for agricultural feedlot purposes.”² 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)”.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 is insufficient.

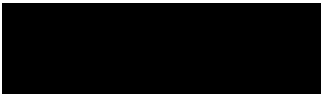

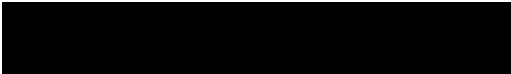
Since obtaining the License to Divert Water, the CFO’s water availability appears to be currently adequate for the time being, but we are concerned about the increase of water consumption this expansion would require and its resulting effects on local groundwater supply, the future environmental impact, 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 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 relies 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). All these concerns have already been noted to have increased since the start of operation of this feedlot. 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 with 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 Parcel


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

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