Technical Document RA25027

Part 2 — Technical Requirements



RCB Natural Resources Conservation Board

Application under the Agricultural Operation Practices Act for a confined feeding operation, manure collection area, and/or manure storage facility(ies)

NRCB USE ONLY	Application number	Legal land description
Approval Registration Authorization	RA25027	Pt. NE 20-50-18 W4M
Amendment		

APPLICATION DISCLOSURE

This information is collected under the authority of the *Agricultural Operation Practices Act* (AOPA), and is subject to the provisions of the *Freedom of Information and Protection of Privacy Act*. This information is public unless the NRCB grants a written request that certain sections remain private.

Any construction prior to obtaining an NRCB permit is an offence and is subject to enforcement action, including prosecution.

I, the applicant, or applicant's agent, have read and understand the statements above, and I acknowledge that the information provided in this application is true to the best of my knowledge.

025 Date of signir

Print name AN Barmentloo

Corporate name (if applicable)

GENERAL INFORMATION REQUIREMENTS

Proposed facilities: list all proposed confined feeding operation facilities and their dimension proposed facilities are additions to existing facilities. (attach additional pages if needed)	ons. Indicate whether any of the
Proposed facilities	Dimensions (m) (length, width, and depth)
Adition on BARN #1	12,2 × 27,43 M
total dimensions:	122.6 m x 12.2 m x 0.6 m deep

Existing facilities	Dimensions (m) (length, width, and depth)	RCB USE ONLY
Barn #1	40 × 240' 95.2 m x 12	2.2 m
RADD #2	44 ×258' 13.4 m x 78	3.6 m
BARN#3	106 × 244 32.3 m × 7.	4.4 m
NRCB USE ONLY LAGOON	78 M × 64 M × 5,5	М.
Existing facilities confirmed		
	and the second second	

Last updated September 11, 2023



Application under the Agricultural Operation Practices Act for a confined feeding operation, manure collection area, and/or manure storage facility(ies)

new facility is replacing an old fac	ity, please explain what	will happen to the old facility	and when. N/A
	Door	mbon 2025	_
truction completion date for prop	sed facilities <u>Decl</u>	MDER avas	
ional information	100 1 10	11 0 11	× 0
ew addition For ealth and Bett	older Wean	mg Age, 1sett	er animal
ealth and Bett	" Welfare.	- · ·	
	Vii		

Livestock category and type (Available in the Schedule 2 of the Part 2 Matters Regulation)	Permitted number	Proposed increase or decrease in number (if applicable)	Total
400 Sow FARROW TO Finish	400	Õ	4/80
No proposed increase in livestock			

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DECLARATION AND ACKNOWLEDGMENT OF APPLICANT CONCERNING WATER ACT LICENCE

issued by Alberta Environment and Protected Areas (EPA) for a confined feeding operation (CFO) Date and sign one of the following four options

OPTION 1: Applying through the NRCB for both the AOPA permit and the Water Act licence

I DO want my water licence application coupled to my AOPA permit application.

Signed this _____day of ______, 20_____,

Signature of Applicant or Agent

OPTION 2: Processing the AOPA permit and Water Act licence separately

- 1. I (we) acknowledge that the CFO will need a new water licence from EPA under the *Water Act* for the development or activity proposed in this AOPA application.
- I (we) request that the NRCB process the AOPA application independently of EPA's processing of the CFO's application for a water licence.
- 3. In making this request, I (we) recognize that, if this AOPA application is granted by the NRCB, the NRCB's decision will not be considered by EPA as improving or enhancing the CFO's eligibility for a water licence under the *Water Act*.
- 4. I (we) acknowledge that any construction or actions to populate the CFO with livestock pursuant to an AOPA permit in the absence of a *Water Act* licence will **not** be relevant to EPA's consideration of whether to grant the *Water Act* licence application.
- 5. I (we) acknowledge that any such construction or livestock populating will be at the CFO's sole risk if the *Water Act* licence application is denied or if the operation of the CFO is otherwise deemed to be in violation of the *Water Act*. This risk includes being required to depopulate the CFO and/or to cease further construction, or to remove "works" or "undertakings" (as defined in the *Water Act*).
- AS RELEVANT: I (we) acknowledge that the CFO is located in the South Saskatchewan River Basin and that, pursuant to the *Bow, Oldman and South Saskatchewan River Basin Water Allocation Order* [Alta. Reg. 171/2007], this basin is currently closed to new surface water allocations.
- 7. Provide: Water licence application number(s)

Signed this _____ day of ______, 20_____

Signature of Applicant or Agent

OPTION 3: Additional water licence not required

- 1. I (we) declare that the CFO will not need a new licence from EPA under the *Water Act* for the development or activity proposed in this AOPA application.
- 2. Provide: Water license number(s) or water conveyance agreement details _

Signed this 7 day of March , 2025.

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ICM=79Meter.

A = Well 7100 Mela. B = PROPOSED Building C = FAM. BOSMA. == 1300 M Dist. To Barn D = FAM. M. SPRUYE == 1350 M Dist To Barn. E = Residence - #830 M Dist To Barn.

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Application under the Agricultural Operation Practices Act for a confined feeding operation, manure collection area, and/or manure storage facility(ies)

GENERAL ENVIRONMENTAL INFORMATION

Barn #1

(complete this section for the worst case of the existing facility which is the closest to water bodies or water wells and for each of the proposed facilities) Facility description / name (as indicated on site plan)

Existing:

Proposed 2:

Proposed 1: _____Addition to barn

Propose	d 2:			Propose	d 3:		
Facility and environmental risk			Facilities				NRCB USE ONLY
	information	Existing	Proposed 1	Proposed 2	Proposed 3	Meets requirements	Comments
Flood plain information	What is the elevation of the floor of the lowest manure storage or collection facility above the 1:25 year flood plain or the highest known flood level?	⊠ >1 m □ ≤ 1 m	⊠ >1 m □ ≤ 1 m	□ >1 m □ ≤ 1 m	□ > 1 m □ ≤ 1 m	YES NO YES with exemption	FROTT RECORCIS. >3,0 METER. Not located in a flood plain
- e	How many springs are within 100 m of the manure storage facility or manure collection area?	0	0			YES NO YES with exemption	None identified
Surface water information	How many water wells are within 100 m of the manure storage facility or manure collection area?	0	0			YES NO	One well ~90 m from proposed construction
Su Su	What is the shortest distance from the manure collection or storage facility to a surface water body? (e.g., lake, creek, slough, seasonal)	>100me	kr Slou	gh.		YES INO YES with exemption	Slough ~192 m to the SW of proposed construction
Iwater	What is the depth to the water table?		310 17,37	>3,0		YES NO YES with exemption	EStimate . > 3 m from drilling reports
Groundwater information	What is the depth to the groundwater resource/aquifer you draw water from?	9.14.	9114			YES NO YES with exemption	DRIlling pepal. 9.14 m in WWID 1889047

Additional information (attach supporting information, e.g. borehole logs, records, etc. you consider relevant to your application)



Application under the Agricultural Operation Practices Act for a confined feeding operation, manure collection area, and/or manure storage facility(ies)

NRCB USE ONLY WATER WELL		WATER INFORMATI	ON									
Well IDs:	1889047	<u>91</u> 229 (not	in use)	91228 (not in use)								
	91230 (decomm	1230 (decommissioned)										
Surface water rela	ated concerns from di	rectly affected parties or ref	erral agencies:	🗌 yes 🔀 no								
Groundwater relat	ted concerns from dir	ectly affected parties or refe	rral agencies:	🗌 yes 🔀 No								
Water wells	□ N/A											
If applicable, exer	mption for 100 m dist	ance requirements applied:	🛛 YES 🗌 NO 🔹 Conditior	n required: 🛛 YES 🖾 NO								
Surface water	🖾 N/A											
If applicable, exer	mption for 30 m dista	nce requirements applied: $[$	YES NO Condition	n required: 🗌 YES 🗌 NO								
	nption Screening T		Constant Constant	E-cilite.								
Wate	r Well ID	Preliminary Screening Score	Secondary Screening Score	Facility								
18890	47	13 = continue to next section	7 = exemption more likely	Barn addition								
Groundwater or surface water related comments:												



Application under the Agricultural Operation Practices Act for a confined feeding operation, manure collection area, and/or manure storage facility(ies)

NRCB USE ONLY

ENVIRONMENTAL RISK SCREENING INFORMATION

ERST for proposed facilities

Facility	Groundwater score	Surface water score	File number
Barn addition	low	low	RA25027

ERST for <u>existing</u> facilities

Facility	Groundwater score	Surface water score	File number
Barn 1 addition with pit	low	low	RA18048
Hog barn 1			
Hog barn 2			
Hog barn 3			
EMS	\checkmark	\checkmark	\checkmark

ERST related comments:

In use

GOWN ID

Albertan Water Well Drilling Report

The driller supplies the data contained in this report. The Province disclaims responsibility for its accuracy. The information on this report will be retained in a public database.

GIC Well ID GoA Well Tag No. Drilling Company Well ID 1889047

View in Imperial

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Date Report Received	2011/11/03
NAME OF TAXABLE PARTY OF TAXABLE PARTY.	The second se

next to shop

Export to Excel

Well Iden	lification and L	ocation								е кероп кесеіле	Measurement in Metric
	A FARMS LTD.		Address R.R. 3			TOWN			Provinça ALBERTA	Country CANADA	Postal Gode T0B 4J0
Location	1/4 or LSD 15	SEG 20	<i>TWP</i> 50	RGE 18	W of MER 4	Lol	Block	Plan	Additional D	lescription	
Measured	rom Boundary o	n from			GPS Coordin Lataude 5	lates in Dec 3.334790	and the second sec	es (NAD 83 lide112.	And a state of the second s	ivation	690.37 m
		m from			How Location			5-10m		w Elevation Obta ferential corrected	ined d handheld GPS 5-10m

Method of Drillir Bored Proposed Well L		Type of Work New Well	
Stock	730		
Formation Log		Measurement in Metric	Yield Test Summary Measurement In Meter
Depth from ground level (m)	Water	Lithology Description	Recomment 45.46 Umin
3.66	bearing	Brown Clay	Test Date Water Removal Rate (L/min) Static Water Level (m)
4.88		Brown Sand & Clay	2011/10/21 100.01 7.13
13.72		Light Brown Sand	Well Completion Measurement in Mel
15.24	Yes	Brownish Gray Coarse Grained Sand	Total Depth Drilled Finished Well Depth Start Date End Date 18.29 m 18.29 m 2011/10/20 2011/10/20
17,37	103	Gray Clay	18.29 m 18.29 m 2011/10/20 2011/10/20 Borehole
18.29		Greenish Gray Shale	
10.40		Greenish Gray Shale	Diameter (cm) From (m) To (m) 106.68 0.00 18.29
			Surface Casing (if applicable) Well Casing/Liner Size OD
ontractor Certif ame of Journeym NIGHT HILL Impany Name LL DRILLING LT	an respon	sible for drilling/construction of wolf	Certification No VB9143 Copy of Well report provident to ownor Date approval holder signed Yes 2011/11/03

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WN ID		The driller supp accuracy. The i	tine the data	contained in this report will be		States and states as		ity for its	GIC Well I GoA Well Drilling Co Date Repo		1889047 2011/11/03
Well Identification	n and Locali									and the second division of the second division of the	easurement in Met
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			1	Differential co	priected hand	dheld GPS	5 5-10m	1	Differentia	I corrected has	ndheld GPS 5-10m
Additional Information										Me	asurement in Metr
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Rato	and the second second	L/min					Describe				
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Contractor Certification		
Name of Journeyman responsible for dniling/construction of well DWIGHT HILL	Certification No VB8143	
Company Name		
HILL DRILLING LTD.	Copy of Well report provided to owner Yes	Data approvol holder signed 2011/11/03

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Application under the Agricultural Operation Practices Act for a confined feeding operation, manure collection area, and/or manure storage facility(ies)

DISTANCE OF ANY MANURE STORAGE FACILITY (EXISTING OR PROPOSED) TO NEIGHBOURING RESIDENCES

						NRCB USE ON	LY	
Neighbour name(s)		Legal land description	Distance (m)	Zoning (LUB) category	MDS category (1-4)	Distance (m)	Waiver attached (if required)	Meets regulations
Bosma	hw	4-18-50-20W4 Lot 1	300	Ag	1	283	yes*	yes
SPRUYT	nu	4-18-50-20W4	350	Ag	1	331	yes*	yes
Unknown	SW	4-18-5-20 WY	830	Ag	1	825		yes
1								
1								

LAND BASE FOR MANURE AND COMPOST APPLICATION (complete only if an increase in livestock or manure production will occur)

				NRCB USE ONLY		
Name of land owner(s)*	Legal land description	Usable area** (ha)	Soil zone ***	Usable area (ha)	Agreement attached (if required)	
n/A.						
N/A for authorization applications						
			Total			

* If you are not the registered landowner, you must attach copies of land use agreements signed by all landowners.

** Available manure spreading area (excluding setback areas from residences, common bodies of water, water wells, etc. as identified in Agdex 096-5 <u>Manure Spreading</u> <u>Regulations</u>)

*** Brown, dark brown, black, grey wooded, or irrigated

Additional information (attach any additional information as required)

*AO note: the application does not result in an increase in manure production, and the CFO footprint will not be extending closer to any neighboring residences. Therefore, an MDS waiver is not required; however, the applicant has provided waivers which are included below.

Applicant	information	NRCB application num	nber:
Operator/c	operation name: <u>AS</u>	na FARMS L+D	
Address:	18413 HW4 14	BeaverCounty	_ Postal Code: To B 4 J 3
	l location of confined feedir		50-18 W4th

I have requested the residence owner(s) named below to waive the required minimum distance separation (MDS) to their residence for the Agricultural Operation Practices Act (AOPA) permit application identified above. In making this request, I have provided the owner(s) with an opportunity to review my permit application and a copy of the Natural Resources Conservation Board (NRCB) Fact Sheet "Minimum Distance Separation (MDS) Waivers" available on the NRCB website at www.nrcb.ca. I have also explained:

- The MDS requirement set out in section 3 of the Standards and Administration Regulation of AOPA. I have advised the owner(s) that section 3(6)(a) of the Standards and Administration Regulation allows this requirement to be waived by the owners of residences, if they agree in writing to grant a waiver;
- That my proposed development does not meet the required MDS to the owner's residence; and,
- That this waiver applies only to this application as described. An increase in livestock capacity, annual . manure production, level of odour production, change to the site plan or change to a facility that would increase the MDS would require a new waiver.

Following is a summary of the proposed development:

Residence owner(s) to initial:

The current scope of my confined feeding operation (CFO), including the type, number, and category of livestock, if any, is: 400 Sows FARROW TO Finish.

My application for a new AOPA permit proposes the following changes to the existing livestock category, type and/or capacity at my CFO:

no Expansion FARROW 10 WS umpe

The proposed new CFO facility(ies), or changes to the existing CFO facilities, including manure storage, manure storage volume and any other pertinent details, if any, are (attach a site layout plan if available):

addition I the applicant understand that the waiver is not valid unless ALL registered owners of the residence sign this document. Date: March 7 2025 Permit Applicant: HBM

SB

LL Names on land title: <u>54 h</u>	nen and Hennie BOSMA.
egal land location of residence(s):	4-18-50-20 NW Lot 1
Telephone number(s) ⁷	Email address(es) ¹ :
Address(es) ¹ and Postal code(s) ¹ : _	

¹ Please note that personal contact information is for NRCB use ONLY and not publicly released

I am/we are the legal landowner(s) of a residence(s) located at the above noted legal land location/address:

- I/we have read the NRCB Fact Sheet "Minimum Distance Separation (MDS) Waivers";
- I/we have discussed this application with the applicant and understand its potential impacts to our residence(s);
- I/we understand that the application does not meet the MDS requirement to my/our residence(s), under the Agricultural Operation Practices Act (AOPA);
- I/we understand that this waiver is not valid unless signed by ALL parties identified on the land title as owners;
- I/we are not obligated to waive the MDS requirement to our residence(s);
- I/we understand that if I/we choose to waive the MDS requirement, I/we can revoke the waiver, by
 providing written notice to the NRCB approval officer, as set out in the "Minimum Distance Separation
 (MDS) Waivers" Fact Sheet; and
- I/we understand that this waiver is a public document.

Having considered my/our rights, I/we hereby waive the MDS requirement to my/our residence, with respect to

Applicatio	n number _
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Signatures or all residence owner(s) on title

> Ymen Bosha

Hennie Bosma

Printed names of all residence owner(s) on title

Date: Makch 7. 2025

	t informatio			RCB application nu	mber:	
Operator/	operation na	ame: <u>FAS</u>	ha Farn	ns 4D		
Address:	18413	HWy 14	Beak	R County	Postal Code:	TOB473
		f confined feedir			-50-18	W 4th.

I have requested the residence owner(s) named below to waive the required minimum distance separation (MDS) to their residence for the *Agricultural Operation Practices Act* (AOPA) permit application identified above. In making this request, I have provided the owner(s) with an opportunity to review my permit application and a copy of the Natural Resources Conservation Board (NRCB) Fact Sheet "Minimum Distance Separation (MDS) Waivers" available on the NRCB website at www.nrcb.ca. I have also explained:

- The MDS requirement set out in section 3 of the Standards and Administration Regulation of AOPA. I
 have advised the owner(s) that section 3(6)(a) of the Standards and Administration Regulation allows
 this requirement to be waived by the owners of residences, if they agree in writing to grant a waiver;
- That my proposed development does not meet the required MDS to the owner's residence; and,
- That this waiver applies only to this application as described. An increase in livestock capacity, annual
 manure production, level of odour production, change to the site plan or change to a facility that would
 increase the MDS would require a new waiver.

Following is a summary of the proposed development:

- The current scope of my confined feeding operation (CFO), including the type, number, and category of livestock, if any, is:
 400 Solu
 400 Solu
 400 Far Row
- My application for a new AOPA permit proposes the following changes to the existing livestock category, type and/or capacity at my CFO:

no expansion RROW 10 + numbers Imal

The proposed new CFO facility(ies), or changes to the existing CFO facilities, including manure storage, manure storage volume and any other pertinent details, if any, are (attach a site layout plan if available):

I the applicant understand that the waiver is not valid unless ALL registered owners of the residence sign this document.

Date: MARCH Permit Applicant: Residence owner(s) to initial:

LL Names on land title:	Hhew Sprayt, Alissa Sprayt	
egal land location of residence(s):	hW-20-50-18 W4th.	
elephone number(s) ¹ :	_ Email address(es) ¹ : _	
and the second second second		

¹ Please note that personal contact information is for NRCB use ONLY and not publicly released

I am/we are the legal landowner(s) of a residence(s) located at the above noted legal land location/address:

- I/we have read the NRCB Fact Sheet "Minimum Distance Separation (MDS) Waivers";
- I/we have discussed this application with the applicant and understand its potential impacts to our residence(s);
- I/we understand that the application does not meet the MDS requirement to my/our residence(s), under the Agricultural Operation Practices Act (AOPA);
- I/we understand that this waiver is not valid unless signed by ALL parties identified on the land title as owners;
- I/we are not obligated to waive the MDS requirement to our residence(s);
- I/we understand that if I/we choose to waive the MDS requirement, I/we can revoke the waiver, by
 providing written notice to the NRCB approval officer, as set out in the "Minimum Distance Separation
 (MDS) Waivers" Fact Sheet; and
- I/we understand that this waiver is a public document.

Having considered my/our rights, I/we hereby waive the MDS requirement to my/our residence, with respect to

Application n	umber
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gnatures of all residence owner(s) on title		
Matthew Sprugt	Alissa Sprnyt	

March 13/25 Date:



Application under the Agricultural Operation Practices Act for a confined feeding operation, manure collection area, and/or manure storage facility(ies)

NRCB USE ONLY					
MINIMUM DISTANCE SEPARAT	ON				
Methods used to determine distance (if app	licable): aerial	imagery			
Margin of error (if applicable):+/- 3 m				-	
Requirements (m): Category 1: 602	Category 2	802	Category 3: 1,00	3	Category 4: <u>1,604</u>
Technology factor:				YES 💢	NO
Expansion factor:				YES 💢	NO
MDS related concerns from directly affected	l parties or referra	l agencies:		YES 💢	NO
LAND BASE FOR MANURE AND		PLICATION	I		
Land base required:					
Land base listed:		N/A for autho	prization applicat	ions	
Area not suitable:					
Available area		Requ	irement met: 🛛	YES 🗌	NO
Land spreading agreements required:	□ YES □ NO				
Manure management plan:	□ YES □ NO	If ye	es, plan is attache	d: 🗆	
PLANS					
	e 🗆 Yes				
Submitted and attached construction plans	YES				
Submitted aerial photos:					
Submitted photos: GRANDFATHERING	LI YES	MO NO			
GRANDFATHERING					
Already completed: RA18048	X YES		A		
If already completed, see					



Application under the Agricultural Operation Practices Act for a confined feeding operation, manure collection area and/or manure storage facility(ies)

LIQUID MANURE COLLECTION AND/OR STORAGE: In-barn - Concrete liner

(complete a copy of this section for **EACH** proposed in-barn liquid manure storage facility with a concrete liner)

Facility description / name (as indicated on site plan)

1. adition to barn 1

2._____ 3.____

Manure storage capacity (use one row in the table for EACH in-barn storage. Attach additional pages if you require more rows)

	Length (m)	Width (m)	Total depth (m)	Depth below ground level (m)	NRCB USE ONLY Calculated storage capacity (m ³)
1.	27.4M	12,2	0,6	0,6	
2.	71				
3.					
				TOTAL CAPACITY	Sufficient capacity with pits

and EMS

Scrape alleys or	BARN IS Fully Slatted.		Method of sulphate protection			
applicable)	Concrete strength		Concrete reinforcement size and spacing			
In harn manuus nit	Concrete thickness Minimal 5 1-0,15 M. Concrete strength Minimal 32 MpA G56 DAYS		Method of sulphate protection Type 10 With 204025% Algash Type 50 OR equivaled sulphode resistent Concret			
In-barn manure pit floors			Concrete reinforcement size and spacing max spacing 15" o/c			
In-barn manure pit	Concrete thickness Minimal 811 (Type 10 with	0,20 h . L 20/25%		hate protection type so or equifelant		
walls	Concrete strength 32 MPa	Horizontal reinfo and spacing	orcement size	Vertical reinforcement size and spacing		

Comments in blue added by AO

Last updated February 26, 2021

OR



Application under the Agricultural Operation Practices Act for a confined feeding operation, manure collection area and/or manure storage facility(ies)

Being Pound, or manune resist To seel pitjoints.	s and any other joints will be sealed. Placed PMOR To Concr SANT Cault Will Deu	etewall sed
Describe sealing practices for piping, etc. that penetrates the lin		
Pipe will be poured in plac		
Concrete requirements can be found in Technical Guideline Agdex 096-93 Guideline minimums: Solid manure: 25MPa (D) Solid manure: 32MPa (C) Liquid manure: 32MPa (B) Category A is required to be engineered Method of sulphate protection: Type 50 or Type 10 with fly ash or equivalent	NRCB USE ONLY Requirements met: Condition required:	YES INO

NRCB USE ONLY Liquid manure storage volume calculator attached:	YES NO		
Depth to water table: >3 m		Requirements met:	🗙 yes 🗆 no
Depth to uppermost groundwater resource: 9.14 m		Requirements met:	🗙 yes 🗖 no
ERST completed: Kee ERST page for details			
Concrete liner requirements			
Leakage detection system required:] YES XNO	If yes, please explain why	
A condition will be added requiring the cond manure) set out in Technical Guideline Agd Collection and Storage Areas".			

Last updated February 26, 2021



Application under the Agricultural Operation Practices Act for a confined feeding operation, manure collection area, and/or manure storage facility(ies)

NRCB USE ONLY								
ALL SIGNATURES	IN FILE	🛛 🖂	NO					
DATES OF APPROVAL OFFICER SITE VISITS								
April 2, 2025								
April 2, 2020								
CODDESDONDENCE WITH MUNICIDALITIES AND DEEEDDAL ACENCIES								
CORRESPONDENCE WITH MUNICIPALITIES AND REFERRAL AGENCIES Date deeming letters sent: March 28, 2025								
Municipality:					-			
	X response received	💢 written,	/email		verbal		no comments received	
Alberta Health Service	es: XN/A							
□ letter sent	□ response received	uritten,	/email		verbal		no comments received	
Alberta Environment a	nd Parks: 🛛 N/A							
K letter sent	X response received	Written,	/email		verbal		no comments received	
Alberta Transportation	: 🗆 N/A							
K letter sent	Kresponse received	💢 written,	/email		verbal		no comments received	
Alberta Regulatory Services: X/A								
letter sent	response received	written,	/email		verbal		no comments received	
Other: Sequoia Resources Corp.								
K letter sent	response received	written,	/email		verbal	X	no comments received	
Others								
L letter sent	□ response received	🔟 written,	/email		verbal		no comments received	