

From: Kevin Turner <email address removed>
Sent: January 21, 2019 10:08 PM
To: Grassy Mountain (CEAA/ACEE) <ceaa.grassymountain.acee@canada.ca>
Cc: <email address removed>
Subject: CEAA Grassy Mountain Coal Project Submission of Kevin Turner

January 21, 2019

Review Panel Manager
Grassy Mountain Coal Project
160 Elgin Street, 22nd Floor, Ottawa ON K1A 0H3
1-866-582-1884 / CEAA.GrassyMountain.ACEE@canada.ca

CEAA Grassy Mountain Coal Project Submission of Kevin Turner, Project Reference #80101

Kevin Turner
<personal information removed>

Directly Affected: As a resident of Crowsnest Pass, a conservationist, journalist, and angler in the headwaters of the Oldman River, and as business owner in Crowsnest Pass located approximately one hundred metres north of Coleman Collieries (an effectively unremediated historic mine site) I have already been significantly and directly affected by the exploratory and permitting phases of the proposed development. I will be further impacted in the event of a successful application for an operational permit. Should this firm, or another, continue forward with the development of the project, the affect will certainly increase.

Dear Joint Review Panel,

Please find this note and the eleven attached documents as my submission regarding the above-noted project.

I've been asked many times for a one-word answer to the questions, "Where do you stand on the Grassy Mountain proposal? Are you for it or against it?" To date, I've offered only my work on, *The Crowsnest Journal* in reply as I've done my best to maintain the ethics of good journalism, the rigour of science, and the public interest at the core of the work. I trust this has allowed others to form their own opinions by drawing on information available on the page, much of which is not available elsewhere. I'll now draw on it for my own submission. Today, I will speak as a citizen of Crowsnest Pass.

I stand in full opposition to the Grassy Mountain Project and here's why:

The Veracity and Behaviour of Riversdale Resources/Benga Mining and its Staff (RR/BM)

-As reported on the page, this firm has at best, a dubious track record internationally. From Mozambique to Melbourne to Alaska to Crowsnest Pass, one finds stories of shady deals, lawsuits, and torn communities in its wake.

-The firm has shown few meaningful environmental sensibilities in Crowsnest Pass. It has denied responsibility or liability for concerns arising from or during the exploratory phase of the development

and has taken only perfunctory actions in mitigation and prevention, and only when forcibly compelled to do so by regulatory input or the court of public opinion. Regarding its capacity to execute the work once ordered, a single culvert installation on the access road to the site prompted by one of my reports to the Department of Fisheries and Oceans Canada (DFO) is perhaps the worst example of culvert installation I've recorded with barriers installed to protect the culvert, not the stream. When casually asked about it, I was told by RR/BM staff the Alberta Energy Regulator (AER) had inspected it and it was fine. My recordings clearly indicate it was not and were subsequently filed with DFO.

-RR/BM staff have behaved with open hostility towards me. In one incident, in spite of holding access rights through adjoining landowners, I was chased up Grassy Mountain by RR/BM staff and told I was not allowed to be there. After a short discussion where I produced the supporting documentation, I encouraged staff to take the concern up with their legal department and went on my way. Similarly, following the reporting a significant release event regarding Gold Creek, RR/BM actively sought to intimidate me physically in their office eventually leading to my removal from the office. One of those individuals left the firm shortly I reviewed the AER's investigation with RR/BM where I noted the similarities between the AER report and the explanation originally offered by RR/BM. In short, it so closely mirrored the explanation as to have been crafted within the same mind.

-Local landowners have been aggressively pursued by RR/BM as without their properties, the mine site cannot be developed. I've been with many of them through times of great upheaval; I've held some while they cry.

Two quotes carved from, Statements of Concern filed to the AER: " We have had to sell our land to the mine, which breaks my heart. I love the land dearly. We had no choice but to sell as our access was being shut down and in the future the mountain above us will be removed. Our stream will lose its source. It saddens me to think the mountain will be removed and this environment will be so damaged. It breaks my heart to leave this mountain, but so goes progress."

And another, " Benga/Riversdale's behavior has undermined the dreams of many, including our own, to enjoy this area of unmatched beauty in the Eastern slopes."

-Throughout the process, RR/BM has provided misleading information regarding the timeframe of the project to Crowsnest Pass Council (CNP Council) at its regularly scheduled updates always claiming the process to be further along than it is. This, I commented at one council meeting, grossly unfair to those attempting to plan for the possibility of a successful application and the manner of development it would bring to the community. Given it took a second Environmental Impact Assessment, and eight addendums to get us to the point we are today, a still incomplete submission by the proponent on the verge of the submission deadline, early reports by the firm of a plan to start construction in 2019 can now be seen for what they were - a lie.

-There are numerous other examples in support of the above some of which are spoken to in previous essays and articles I've written on the topic. As will be the case with additional topics below, these will become part of my submission in support of this statement.

Inappropriate Support and Misinformation Campaigns

-I've attended and recorded most, if not all, of the presentations made by RR/BM to CNP Council. Following many of the meetings, folks who've asked me questions afterward usually include a question about the support shown by CNP Council towards the proponent referencing it as inappropriate. At one presentation during council question period, a councillor turned the floor over to a retired mine manager for his input. The mayor and certain councillors have actively sought to quiet my voice going so far as to restrict me from press status; fortunately, I can still ask questions as a citizen.

-The local print media, *The Pass Herald*, is operated by one of our town councillors. How anyone can wear the hats of publisher/editor/town councillor ethically is beyond my capacity for logic and ethics. This platform has been used repeatedly in support of RR/BM messaging including a regular column by the firm. It has also been actively used to quiet dissenting voices with perhaps the greatest example being a response to one of my queries to council being answered by editorial in the next edition of the paper.

-The AER, during the exploratory phase, seemed willing to accept the proponents statements and reports without question or concern. The 2015 Gold Creek incident mentioned in the previous section perhaps the salient example. Other examples include the Blairmore Creek release event in 2017, the above noted culvert installation, and my direct communication with both the proponent and the AER quoted in my attached articles.

-I been reviewing submitted statements by supporters of the proposal and they all sing the same song, the song of jobs, taxes, and a return to a culture no longer possible in today's global realities. It's the song of RR/BM, of only holding a hammer so everything is a nail. It's also the song of leadership gone wrong. To my way of thinking, our community's leaders ought to have our communities welfare in the fore, not the proponents. Trickle-down economics perhaps? We take care of the corporation, the corporation will take care of us - what folly in this context.

-I've done my best through, *The Crowsnest Journal* to attend to the lack of appropriate oversight and community protection through public-interest journalism on the file; as above, additional articles and reports will be added in support of these specific statements.

Regulatory Ethics and Dysfunctional Systems.

-As previously noted, the AER has not provided appropriate, ethical oversight during the exploratory phase of the development, yet now holds significant sway within the review process which may lead to a recommendation to allow the operational permit. The AER, an industry-funded regulator, has yet to show an honest expression of any duty of care it may hold for Albertans on this file. I believe the AER involvement in the process does little to insure the public trust and may well form the basis of appeals and other legal remedies to ensure the greater good and a just process moving forward thus bringing the process itself into question. This, the core of my concern regarding the sufficiency of the EIA and its merit.

-In communication with the AER over the last few years, I've found it to be an organization unable to respond to the simplest of concerns in a timely fashion. A 2018 incident regarding historic mining concerns and McGillivray Creek, a major tributary to the Crowsnest River, found an AER investigator unable to find the mine portal. This in spite of a GPS point, numerous pictures and supporting evidence, and my phone number complete with an offer to tour the investigator to the site as I had gained the landowner's permission. Remarkably, the investigator was able to file their report without having found the portal, the source of the contamination.

-Many other reports of this nature regarding the AER could be written with the information I have on hand. However, in the interest of brevity at this time, I will keep it to the examples above combined with the supporting articles and reports provided with my statement as I believe it sufficient prompt.

This proposal, and more importantly the review process itself, has the ability to alter the economic, environmental, and culture future of the Oldman River headwaters in ways that cannot be easily undone. As such, I believe it incumbent on all involved, all concerned, to apply the concept of rule of law, strong ethics, and our level-best efforts to insure a just result; a result all Canadians, all Albertans, and all that walks, crawls, roots, swims or flies in the Oldman headwaters, can live with.

In the end, is this not what the review process, our democracy, and our shared humanity about?

Requested Disposition: I believe given the above and attached concerns, in concert with other information at my and the panel's disposal, the Joint Review Panel has no ethical choice but to recommend the denial of this application, and all related applications, in its entirety. I formally request the panel deny Riversdale Resources/Benga Mining Grassy Mountain Coal Project Application CEEA Reference #80101

Sincerely,

Kevin Turner

Appendix: Please find eleven attached documents in support of the above statement.

- A Broken System Begins to Function and Grassy Mountain Smiles
- Advertising/Advocating For Riversdale Resources
- Backgrounders on Riversdale Resources
- Coal's Toxic Legacy A Job Creator and Crowsnest Pass Can Be A Leader in Alberta and Globally: Economic Redevelopment One and Two
- Gold Creek Cutthroats Condemned by Coal
- Ineffective Oversight from the Alberta Energy Regulator
- Is This the Crowsnest Rivers Future?
- Press Freedom v. the Bully Pulpits, aka Speaking Truth to Power in Coal Country
- Public Health and Cutthroat Concerns in Blairmore Creek
- Riversdale Coal Rips Apart Community
- The Sunday Collection: Coal's Toxic Legacy

A Broken System Begins to Function and Grassy Mountain Smiles

This was an interesting week in North American politics. With the death of American Senator, John McCain we are reminded of what public service ought to be about; on the other end of the spectrum, we have the rancorous braying of those too frightened to face new realities, global concerns, and ultimately, themselves and their chosen way of thinking.

The Federal Court of Appeal did exactly what an appeals court ought to do this week, it defended our democracy by defending the rule of law. This basic premise, that the law applies to all with equal weight and rigour, is foundational, functional, and final. Contrary to the calls of activism within the judiciary, moving goalposts, and foreign-funded green intrusions into our economy by the political right, the Alberta premier, Rachel Notley remained calm in reminding Ottawa of the need to attend to its own process with the same respect for our democracy as shown by the F.C.A..

No, you can't piggyback on the corruption of the Harper regime and yes, you must go back and talk with folks in a meaningful way before expecting their support or an agreement to disagree is effectively what the court has said. If this project is in the national interest, then behave like it by taking an honest interest in the concerns of all its citizens without using power and privilege to bully them. This is every bit as true locally as nationally and the court's decision bodes well for the federal review process now formalized with an ordinance in council which struck the joint federal-provincial review panel concerning the Grassy Mountain met-coal strip mine proposal July 9, 2018.

The need for reparation to broken systems regarding Grassy Mountain has been reported many times on this page. Provincially, from the attempted burying of concerns regarding the entrainment of coal into Gold Creek in 2015 to the frank refusal of the Alberta Energy Regulator to acknowledge acid rock drainage impacts in Blairmore Creek to its absurd response to a 2018 discharge into McGillivray Creek from historic mine works, the industry-financed regulator has long ago forgotten the concept of rule of law or simple fair play. Municipally, the story is much the same with some folks becoming little more than an extension of Riversdale Resources as opposed to the defenders of democracy and our community they ought to be.

The fine report found below from the, National Observer lays bare the reality of mining regulation in British Columbia comparing it directly to Brazil's system. Most Canadians and Albertans like to think we are better than this, well we are, but not by much. A personal case in point, "would I still be alive if I was reporting on these issue in Brazil in the way I've done in Canada?" Unlikely. While certainly grateful to still be here, I've paid a heavy price for the hard work of serving the public interest on this file and anticipate more attacks on the messenger as the process continues. This, a direct outflow of the rancorous braying to my chosen way of thinking.

The week's F.C.A decision is a win for all Canadians, a win for our democracy, and a win for our planet because it guides us home to the place we function best - an honest place one mindful of the greater good and the concerns of others. To view it any other way is simply selfish and immature. Here's to a transparent review process, to the rule of law, and to our shared humanity - the point of it all. -KT

Advertising/Advocating For Riversdale Resources?

The January 4, 2018 update by Riversdale Resources/Benga Mining (RR/BM) to Crowsnest Pass Council regarding the Grassy Mountain Project proposal found a full gallery asking important questions about the project and the approach of local government. While the minutes of the meeting convey much of the discussion, they understandably do a poor job of relating the essence of the meeting.

Minutes from the last meeting can be found here:

<https://www.crowsnestpass.com/public/download/documents/47560>

Following the presentation by RR/BM the floor was opened to questions from council and the gallery. One local business person expressed concern regarding the availability of information on the project and the feeling that council ought to be doing more on behalf of the community. This was met with a round of pointed, accusatory questions by Mayor Painter who appeared to chastise the citizen for not having done their homework.

"I'm assuming you haven't been to a RR/BM open house where they have presentations?" queried Mayor Painter. Spirited discussion followed at the end of which RR/BM addressed the issue directly by explaining they are working on a new map and other updates to its website. As RR/BM's original website provided only a bare minimum, the noted improvements were welcomed by all involved.

Following other questions from the floor, Counsellor Sygutek provided her thoughts on the subject then introduced a member of the gallery (a retired coal mine manager) as an expert on, "how wonderful coal mines can be in a community". The councillor went on to express her belief that RR/BM has been, "very open and transparent" and, "excellent about answering questions by local media". She went on to provide the opinion that, "ultimately, professionals are going to make that decision of whether or not we are going to have a mine in this community" before expressing her deep admiration for the industry in a personal context.

Councillor Sygutek then went on to dismiss the concerns of citizens expressed through the Environmental Impact Assessment process with the statement, "I really think one hundred notices of concern, many of which I, I, probably think are duplicate, really isn't a lot of concerns by any stretch of the imagination" before turning the floor over to the gallery expert she introduced earlier. Having assisted folks from all sides of the debate with, Statements of Concern and, Letters of Support I am well aware of both the effort required and of the personal investment folks have made in their statements. These efforts are also known as responsible citizenship or active participation in our democracy and should never be diminished in any way, especially by an elected official in chambers.

Following the expert's thoughts on the project, Councillor Anctil provided a well-reasoned explanation to the question of why there's isn't more information available about the project on the municipal website. It was explained RR/BM is a private firm and as such, it would be inappropriate and unfair to other businesses in the area. Given this explanation, one must ask where the line between avocation and advertizing ought to be drawn in council meetings. A number of other minor issues were then discussed before the meeting was brought to an end.

Following the meeting, a number of the attendees were interviewed with each expressing concerns about the nature of the meeting and the way it was conducted. Most folks felt the mayor and some councillors spent an inappropriate amount of time and effort speaking on behalf of RR/BM and an

insufficient amount of time and effort attending to the concerns of community members. Given the above interactions, previously reported concerns, and the independent oversight provided by the, Crowsnest Journal on the file, I cannot disagree with the assessment as both a journalist, and as a member of our community. -KT

Picture by Kevin Turner shows public notification of the September 14, 2016 RR/BM to CNP Council meeting on the municipality's notice board at the town office. Several times I've had to resort to this as no notification was available on the municipal website. In spite of researching the topic and advising the municipality of the concern each time it occurred, the oversight was repeated a number of times.

Backgrounders on Riversdale Resources

Ahead of the January 21, 2019 deadline for submissions to the federal/provincial Joint Review Panel regarding the Grassy Mountain met-coal strip mine proposal, a brief history of the company's international and local efforts seems in order.

Riversdale Resources first made international waves with the sale of an African coal lease to Rio Tinto, a major international player. This dubious sale led to massive financial losses and numerous ongoing lawsuits; the breadcrumb trail starts here: <https://www.afr.com/business/mining/how-rio-tintos-mozambique-mess-unfolded-20171018-gz3ana>

Prior to the purchase of the Grassy Mountain lease, the firm looked at a coal lease in Alaska; reports from Alaska suggest the firm was not welcome.

http://www.frontiersman.com/.../article_940a91fc-c4b7-11e1-b3...

<https://www.alaskapublic.org/.../riversdale-puts-chickaloon-.../>

Locally, the first order of business following the sale of the property to Riversdale Resources was for Municipality of Crowsnest Pass' mayor and council of the time to attempt to expropriate a portion of MD Ranchland #66 including Grassy Mountain, presumably to realize the full measure of taxation from the project.

On the Sale: <http://www.miningweekly.com/.../consol-energy-sells-nonproduc...>

General Overview: <http://www.cbc.ca/.../coal-mining-revival-in-crowsnest-pass-e...>

Local Interviews: <http://www.thefreepress.ca/.../crowsnest-pass-welcomes-minin.../>

Thoughts from MD #66: <http://www.nantonnews.com/.../ranchland-surprised-with-grassy...>

While MD Ranchland #66 stands firmly in opposition to the project, the current Municipality of Crowsnest Pass administration regularly voices its support for the project and has facilitated the proponent in many ways. Regular updates have been provided by Riversdale Resources to Crowsnest Pass Council throughout the process.

Ahead of specific reports on the Crowsnest Pass presentations, a link to the municipal website where meeting minutes and notifications can be found: <https://www.crowsnestpass.com/municipal-government>

I encourage all concerned to take the time to read through the articles to form your own opinions ahead of any submission you might make to the review panel. An informed voice has power and weight, yet can still carry great emotion. We can do this Albertans, and do it well. -KT

Coal's Toxic Legacy: A Job Creator?

And, Crowsnest Pass Can Be a Leader, in Alberta, and Globally!



In two previous essays on this page regarding economic redevelopment, I made a case for using government and industry money to remediate a number of different industry's sins in the Oldman River watershed. The essays can be found below. While a full study of this is beyond the capacities of this page, it is certainly not beyond our government and industry's remediation specialists to quantify this idea.

The first link explains an American approach to the idea of remediation as a job creator; others tell the Elk Valley story. Teck has worked diligently to reduce its operational impacts in the Elk Valley; unfortunately, even that effort is coming up short of the mark. Perhaps streams simply have a limit to what they can endure and still support the full range of biodiversity they supported prior to the impacts of coal extraction?

I've begun collecting independent Oldman Basin water quality data from a number of sources; this is not an easy task. Testing is expensive, the protocols strict; while industry is forced to monitor water quality, the integrity of the results and their public presentation is often dubious and lacking context as is the case with Riversdale Resources/Benga Mining's (RR/BM) press release following the issue in Blairmore

Creek spring 2017. The results of initial water quality testing was reported in the local print media, The Pass Herald and by our municipality by way of social media.

To my way of thinking, water protection is the salient issue of this and all future development and recreation on the eastern slopes; without water no one wins - ever. -KT

An American Approach: <https://www.eenews.net/stories/1060043632>

Blairmore Creek Issues from the, Pass Herald: <http://passherald.ca/archives/170510/index1.htm>

Blairmore Creek Issue from the, Crowsnest Journal:

https://www.facebook.com/thecrowsnestjournal/posts/1459687567499538?__tn__=K-R

A Dying Elk River: <http://arivernever sleeps.com/death-by-coal/>

Teck's Plan for the Elk Valley: http://www.teck.com/.../2015-Water-elk_valley_water_quality_p...

Crowsnest Pass Can Be a Leader, in Alberta, and Globally!

These two essays were originally published to the page in January of 2016. while the referenced federal and provincial programs have now ended, other programs and actions could certainly provide the initial monies to move forward with job creation through environmental remediation and economic diversification. We can do this folks, and do it well. -KT

Economic Stimulus in the Oldman Headwaters One - What is Our Future to Be?

The Oldman River headwaters have been managed primarily for resource extraction over the last century; we are now in the beginning of a broad policy shift towards science-based management mindful of our most precious resource - water. The recent Castle parks designation supports this, as does the shift towards tourism playing a larger role in the economy of Crowsnest Pass. A new strip mine on Grassy Mountain is clearly inconstant with this policy shift, the recovery strategy for westslope cutthroat trout, and our region's long-term economic welfare.

Mining built Crowsnest Pass and remains a vital part of its economy. Without the Teck mines in B.C., our economy would be in significantly worse condition primarily due to a lack of economic diversification. Sadly, we remain stuck in a boom-bust cycle. This cannot continue forever if we are to flourish. The mine proposal requires a hard look for many reasons as it may limit our ability to expand the economic base in Crowsnest Pass. I have friends in the industry and many of them see this too reminding me of the struggles Teck is facing to maintain its operations during the global downturn in resource prices. I believe Teck, an industry leader in responsible resource extraction in the area, should be supported during this time and applauded for their thoughtful approach to mitigation strategies especially in regards to water quality.

Crowsnest Pass is already diversifying on its own, with little support from government. The land attracts and supports strong, resilient people many who see the value of our landscape beyond resource extraction. There are an increasing number of successful eco-tourism events and groups in Crowsnest Pass to compliment the established forms like OHV use, hunting and fishing. The proposed Grassy Mountain development, by all accounts, will radically alter the surrounding landscape and has already caused significant harm to Gold Creek's fishery. Does one industry have the right to destroy another's product; the landscape integrity and aesthetic value that draws people to our valley?

No one here is talking about shutting down industry completely; quite the contrary. The recent raising of westslope cutthroat trout to the Canada Gazette and other governmental policy shifts, provide a clearer set of rules for all to follow. This assists industry in allowing for proper budgetary and operations

planning and provides recourse when the rules are not followed. This also protects the landscape, watershed, or "product" if you will for all user groups. Resource extraction will always be a part of the management of the eastern slopes in some way, just not the primary focus. I hope more companies can become enlightened to the fact that good environmental practices are good business practices.

The task ahead is difficult, but far from impossible. Can we honour the positive aspects of our resource extraction legacy, clean up the legacy's more unpleasant aspects, and move towards creating a new identity and legacy our grandkids can be proud of in the Oldman River headwaters? I believe we can. It will however; take honesty, some help from our provincial and federal governments, and a real willingness to work together to find the best solutions for all if we are to flourish.

Crowsnest Pass can be a leader, not only in Alberta, but globally in areas of landscape mitigation, Species-at-Risk recovery, and economic diversification in an area once based in resource extraction. This can be accomplished while moving towards a tourism-based economy and implementing policies that support the protection of our most precious resource - water. The work will be hard, the pay may be poor at first, but we can do this and do it well. I believe we owe it to all who came before and all who will follow to give our best.

-Kevin Turner

Economic Stimulus in the Oldman Headwaters Two- How Can Our Governments Assist?

Is this the break (this essay was originally written on the heels of an announcement of federal infrastructure monies) we need to kick-start sustainable economic and ecological recovery in Crowsnest Pass and the Oldman headwaters as a whole? Can our free, impartial indicators of watershed health, our native trout lead the way? The recent announcement of federal infrastructure funds could easily provide needed seed money to attend to our collapsing infrastructure, provide for long-range community planning, and help us prepare for the realities of the new world we find ourselves in.

Crowsnest Pass has a wealth of undeveloped potential in eco-tourism beyond the established forms we're already known for like hunting, fishing, and OHV use. Over the last few years events such as the Sinister 7 ultramarathon, and the Rumhead Enduro have started to raise awareness of what we have to offer here. Sadly, development of this nature has been restricted by the scars of unremediated resource extraction and a lack of local leadership in this regard. Identification of these issues using this money, followed by appropriate mitigation strategies implemented and paid for by the responsible party, would maximise the effectiveness of the infrastructure money while creating jobs and new industries that could be shipped to the world.

The need to transition the primary focus of eastern slopes management away from industrial resource extraction and towards management for water resources is very real and this may be a good starting point for all concerned. Water is not a partisan issue. The recent protection provided Westslope Cutthroat Trout under the federal Species At Risk Act, also speaks to the need for this transition as the Oldman headwaters holds what I believe to be the best opportunity for future recovery of this species in its streams. Bull Trout, our provincial fish, will likely receive the same "Threatened" status in the Oldman drainage shortly and this will also need to be addressed. Management for water solves many of our mutual problems not only in the headwaters, but for all downstream users like agriculture as well.

I believe we've already turned the corner in Alberta towards a more inclusive, conciliatory approach to many of our mutual concerns. This hasn't been easy and there is still great amount of work to be done. Perhaps that's the key to it all - hard work; it's something we Albertans are known for. It's hard to point the finger at the other fellow with a shovel in your hand. Ultimately, the Alberta Advantage is its people - let's never forget that!

-Kevin Turner

2018 picture by Kevin Turner shows the overall condition of Coleman Collieries in, Crowsnest Pass 15 years after the ESRB signed off on the site's remediation. Given folks have recently been trying to sell the coal spoils from beneath the old bins, the obvious condition of the site, and the continued entrainment of deleterious substances into the Crowsnest River from the site, many hard questions need to be asked.

Gold Creek Cutthroats, Condemned by Coal?



Bed, Bank, and Shore Coal Deposition Gilmar Property/Gold Creek July 18, 2015

As with the previous revision of this article, I believe it in the public's interest to be aware of this occurrence prior to the January 21, 2019 closing of submissions regarding the mine's operational permit to the Canadian Environmental Assessment Agency's Joint Review Panel. While the coal certainly plays a role here, the condemnation may well be the responsibility of other forces.

Not previously reported on this file is a meeting between myself and Riversdale Resources/Benga Mining (RR/BM) held November 29, 2017. During that meeting I explained the investigation and concerns detailed below focussing on the July 2015 conversation between myself and RR/BM's environmental manager at time and the Alberta Energy Regulator's (AER) resultant decision; specifically how closely the AER report mirrors the explanation provided by RR/BM staff on July 20, 2015. Interestingly, the environmental manager left his position with the firm within days of the noted meeting. RR/BM has since refused comment on the nature of his departure.

Given AER's responsibilities under the joint review process, the actions of the proponent on this and other reported files, and the seeming inability of federal and provincial investigators beyond the AER to take action on this file, Albertans and all Canadians will need to ask a number of hard questions as part of the joint review process. Ultimately it is our responsibility as citizens, not only the regulators, to insure a just result here for all that swims, walks, crawls or flies.

We can do this, and do it well. -KT

Gold Creek Cutthroats, Condemned by Coal? (December 2017 Revision)



Entry Point of Coal and Other Substances from Grassy Mountain into Gold Creek August 30, 2015

Below you will find a revision to a story which began in July 2015 and continues to this day. Since its writing, the Alberta Energy Regulator has rendered it's decision: (Link failed to load, see instructions below)

The AER's decision is wildly inconsistent with my independent investigation of the incident and contrary to findings I've discussed with federal investigators looking into the file. While it will take a significant amount of work and time to correlate the inconsistencies, a few stick out like sore thumbs. I believe it in the public interest to be aware of this incident prior to the December 8, 2017 closing of submissions regarding the mine's operational permit, and as such, I'll provide what I can at this time.

Notable Issues and Inconsistencies:

-The Date of the Thunderstorm/s: The AER contends the storm occurred on July 17 and goes on to reference Alberta Environment and Parks data in its report claiming, "Alberta Environment stream-flow data for Gold Creek (north of the release) confirms that there was a large spike in the measured flow in Gold Creek. My investigation informs a major thunderstorm occurred on July 11 and another smaller storm in the area on July 16. Alberta Environment and Parks data confirms my findings, as pictured in the post, not the AER's.

-Inability of the Regulator's Investigators to Identify Coal Deposits: The AER decision states, "AER staff did check the Gold Creek Bridge at Hwy 3 near Frank, Alberta and could not identify any coal deposits at that location" A picture's worth a thousand words; clearly the posted picture shows coal fines deposited at the Highway Three Bridge in Frank.

-A full Investigation was not Completed by the AER at the Time of Release: "How far the coal travelled down Gold Creek and the exact impacted area were not determined" Why not? I was able to track coal and other substances into the main stem of the Crowsnest River following the release.

-Riversdale's Environmental Impact Assessment Nov 2015: While it notes the presence of, "coal fines and sediments" it attributes them to, "previous mining activities in the watershed and deposited in Gold Creek." Interestingly, they were able to identify historic deposits, but were unable to find the more recent ones.

It will take a great deal of time and effort to complete the review of the decision and all associated documentation. I hope to find the resources as soon as possible to attend to this as I believe it vital to the persistence of native trout in the streams surrounding the project. Until that time, this information, along with information in the EIA and the AER report, ought to be enough to beg many question about the veracity and transparency of both the proponent and the AER.

Frankly, the AER reports closely mirrors the, "explanation" provided by Riverdale Resources/Benga Mining staff I received on July 20, 2015 after informing them of both the release event and my subsequent filings to the AER, Department of Fisheries and Oceans Canada, SARA, and Environment Canada.

To the best of my knowledge, no action has been taken to remediate the damage to Gold Creek or to remove the massive amount of coal and other substances which remain on one private landowner's property. All Albertans, and specifically the people of Crowsnest Pass and the MD Ranchland (the location of the mine site), simply deserve a more robust response to incidents of this nature now and into the future; don't you agree? -KT

NB: To access the AER decision Google, "AER's Compliance Dashboard" then enter, "Benga" in the search box under the, "Investigations" tab and a PDF of the decision and supporting documentation will appear.

Cutthroat Trout's Crowsnest Coal Concerns (First posted September 13, 2015)



Coal Deposition on Gilmar Property Near Gold Creek August 30, 2015

Gold Creek's threatened Westslope Cutthroat Trout received another blow to their recovery in Mid-July 2015 when a substantial amount of coal and other substances flowed from a historic coal spoils pile on the east flank of Grassy Mountain. The material moved into Gold Creek via a small tributary following a major rain event and was recorded as far away as the Crowsnest River, some 12 km downstream. Early observations suggest a massive blow to Cutthroat Trout populations as a result of this release.

Riversdale Resources, an Australian mining company operating as Benga Mining, purchased the abandoned Grassy Mountain open-pit coal mine in August of 2013 with an eye to redeveloping the site to produce metallurgic coal for the Asian market. Exploratory work is now underway while the full approvals process takes place. A two year environmental impact assessment of the project has been ordered by the federal environment minister, but in light of recent events, a good case for stronger protection and oversight during the exploratory phase of the project could easily be made.

Gold Creek, on the east flank of the project, is federally-listed critical habitat for Westslope Cutthroat Trout (WSCT) above the waterfall which has kept this population genetically pure by restricting the upstream movement of non-native Rainbow Trout. Cutthroat Trout now persist in only about five percent of their historic range so every one of the approximately fifty streams where they hang on is increasingly, and critically, important. On the west flank of the mountain lies Blairmore Creek, a portion of which is also listed as critical for the recovery of WSCT. To the north lies Daisy Creek, spawning

grounds for our provincial fish, Bull Trout, also listed as threatened in Alberta and under consideration for an elevation of their federal status to "Threatened" in this watershed.

The Crowsnest Journal encourages everyone to ask questions, share this post, consider the trade-offs being asked for, talk about it with each other, contact your elected officials and others and let them know what you expect and what your vision of the Oldman River headwaters looks like. Knowledge is key; the more we share, the more we know. Action can serve to raise the quality of the mitigation solutions for all involved and insure best practice is followed if the mine is allowed to proceed.

Currently, the release event remains under investigation by The Alberta Energy Regulator (AER), the Department of Fisheries and Oceans Canada and Environment Canada. Based on recent administrative actions, including the application of penalties to Riversdale Resources regarding a much smaller release event in 2014, a decision from the investigators can be expected within the next few months. Interestingly, to the best of my knowledge, no work has been done to date to mitigate the impact of either release event.

-Kevin Turner

Pictures by Kevin Turner show coal deposition on private property and follow the entrainment of coal into Gold Creek and downstream to the Crowsnest River. Also provided is a flow meter chart for Gold Creek and metrological data from the closest station from the time clearly expressing the inaccuracy of the AER report. To my knowledge, no action has been taken to date to mitigate the impacts to private lands and public streams resulting from this release event. Clearly our systems are broken.



The Source of the Coal and Other Substances Grassy Mountain Spoils 1 July 18, 2015



Gold Creek at Ford Upstream of Lille July 19, 2015



Coal Fines in Gold Creek at Highway Three July 18, 2015

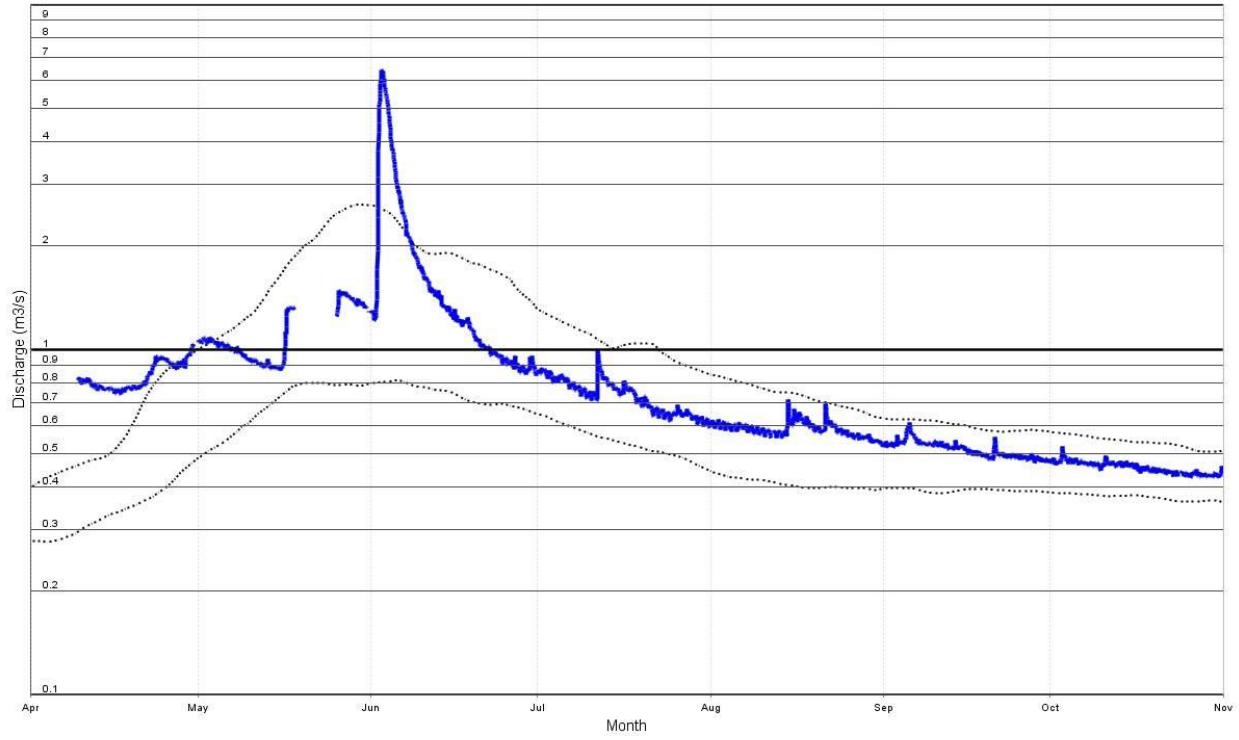


Coal Fines in Gold Creek at Crowsnest River Confluence July 22, 2015



Coal Fines in Crowsnest River Approximately 200 metres Downstream of Confluence July 22, 2015

Gold Creek near Frank (05AA030)
River Data* - Apr. 01, 2015 - Nov. 01, 2015
▲ Current Year ▲ Normal Range (Quartiles)



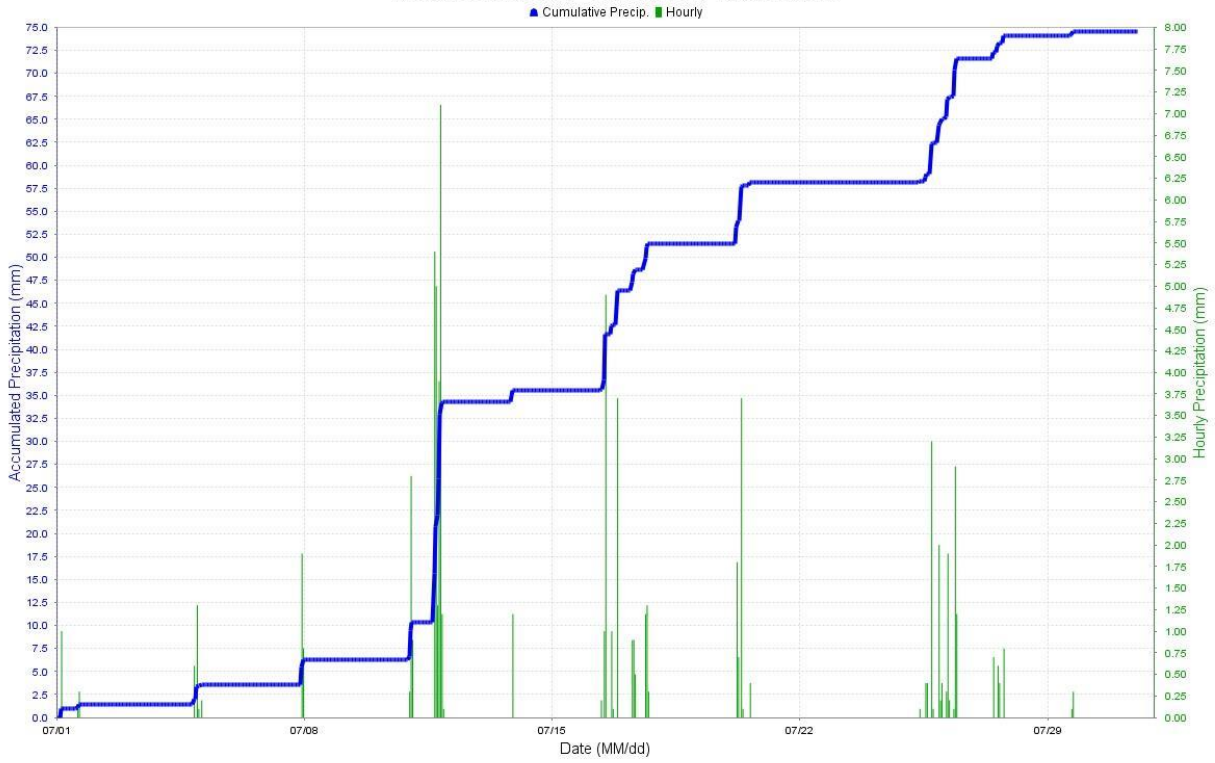
Government of Alberta

Longitude:-114.4019 Latitude:49.5994 Created: 2015-12-31 07:25:56 MST

*Preliminary Data subject to Revision

Gold Creek Streamflow Chart 2015

**South Racehorse Creek (05AA817 Elevation:1920.0m)
Meteorological Data* - Jul. 01, 2015 - Aug. 01, 2015**



Government of Alberta

Longitude:-114.6 Latitude:49.78333 Created: 2015-07-31 13:47:58 MDT

*Preliminary Data subject to Revision

South Racehorse Creek Precipitation Gauge 2015

Ineffective Oversight from the Alberta Energy Regulator

Three significant release events from historic mine works have occurred since, 2015 in the Crowsnest River drainage: A 2015 release of coal and other substances from the east flank of Grassy Mountain related to Riversdale Resources' efforts to reopen the historic strip mine there, a discharge of toxic orange effluent from underground works on the southwest flank of Grassy Mountain also potentially related to Riversdale Resources' efforts, and a similar discharge from a historic portal into McGillivray Creek related to Coleman Collieries. Beyond the historic mining sources, these events have one thing in common - the failure of the Alberta Energy Regulator and other officials to provide effective, ethical, transparent oversight of the process and the lack of any significant remediation of the impacts. Why?

Grassy Mountain is found approximately 8km north of Blairmore, Crowsnest Pass in the Municipal District of Ranchland #66 and is flanked by Gold Creek to the east and Blairmore Creek to the west; both of these streams contain pure-strain westslope cutthroat trout and sections listed as Critical Habitat under a federal protection order. In spite of this, the Alberta Energy Regulator (AER) has provided little in the way of effective oversight during the project's exploratory phase. Previous CNJ reports on two separate release events, one into Gold Creek and one into Blairmore Creek are linked below.

The AER's lack extended to an historic mining impact in McGillivray Creek spring 2018 where again, the investigation was weak and no action has been taken to mitigate the impact or to prevent a reoccurrence. As is often the case, orphan wells and the oil industry absorbs all the oxygen on the file leaving orphan mines and the Alberta mining industry an afterthought at best. Two recent mainstream news articles and an opinion piece which speak to this are linked below as is the initial CNJ report.

My direct experience in covering local release events followed by numerous attempts to hold the regulator to account closely mirrors the experiences noted in the mainstream articles. Given the numerous unremediated sites in the area, it's disturbing to see how little the AER knows of this given their mandate.

I've yet to write the full update on the historic, repeating impacts to McGillivray creek after prompting an investigation following this year's release event. Health concerns, research, and the need for additional responses from the AER to my queries have slowed progress on this important file.

The initial response for the AER explained no one holds any responsibility for the April 2018 McGillivray Creek release, and went on to discuss other historic impacts which have nothing to do with the matter at hand. Oddly, the inspector could not find the historic portal in spite of its location a mere 300 metres from Highway Three (yes, you can see from the highway), a provided GPS point, and my contact information. I would have gladly guided the inspector to the location and had secured the landowner's consent in case of this eventuality, but I suggest the inspector accomplished what was required without further assistance.

I've often described the, "Alberta Advantage" as the creation of world-class environmental policy and regulation combined with the utter inability to utilize it in a meaningful way; it appears I am not alone in my assessment. We can do better Albertans, and we ought to do it soon. -KT

Tailings Ponds: <http://calgaryherald.com/.../0d178656-a7bb-4045-a49f-7c5febdd...>

Farmers Impacted: <https://www.albertafarmexpress.ca/.../orphan-wells-a-growing.../>

ON the Regulator's 5th Anniversary: <http://edmontonjournal.com/.../opinion-on-its-fifth-anniversa...>

Gold Creek 2015 Release

Event: <https://www.facebook.com/thecrowsnestjournal/posts/1159502147518083>

Blairmore Creek 2017 Release

Event: <https://www.facebook.com/thecrownsnestjournal/posts/1158902170911414>

McGillivray Creek 2018 Release

Event: <https://www.facebook.com/thecrownsnestjournal/posts/1247875032014127>

The AER's Compliance Dashboard: <http://www1.aer.ca/compliancedashboard/index.html>

Riversdale Resources: <http://www.rivresources.com/site/content/>

Is This the Crowsnest River's Future?

Yes, is the short answer. Historic mining impacts can take decades to develop and centuries to resolve. With this fine article, the Narwel delves deeply into the issue providing a solid understanding of the current situation and likely outcomes.

Similar impacts continue to occur in the Oldman River drainage; however, few have been willing to acknowledge, never mind address, the concerns directly.

Cumulative impacts must be strongly considered by the Grassy Mountain review panel when they consider the merits of the project to insure a decision which insures the welfare of our most precious resource - water. -KT

The Referenced Article: https://thenarwhal.ca/for-decades-b-c-failed-to-address-selenium-pollution-in-the-elk-valley-now-no-one-knows-how-to-stop-it/?fbclid=IwAR1cq4X-MRumxQLMp_7G1BEPQEibkCD8QhmkpTP9OvSmSfp2Qx40d01NZ9Q

Press Freedom v. the Bully Pulpits aka, Speaking Truth to Power in Coal Country

Last week's editorial in the local print media, the Pass Herald encapsulated the approach often taken by staunch supporters of Riversdale Resources'/Benga Mining's (RR/BM) proposal to reopen the historic met-coal strip mine on Grassy Mountain. Recent submissions to the Canadian Environmental Assessment Agency's (CEAA) joint review panel from some locals also express a similar tone.

We need jobs, we need a stronger tax base, Riversdale Resources has the best interests of our community at heart, and that regulators and governments will provide responsible, ethical oversight. Simple no? Well it would be if the facts fully supported the assertions, but they don't and my reporting of this has led to much venom, personal debasements, and a host of other unpleasant realities.

Prior to reports on a number of specific concerns in this regard resulting from council presentations and other events as well as particular environmental concerns prior to the January 21, 2019 deadline for submissions to CEAA, below you will find a post originally placed March 7, 2017 following the February 28, 2018 presentation by RR/BM to Crowsnest Pass Council. It provides an understanding of the changing face of Canadian Journalism and also speaks to efforts to restrict my capacities as a journalist, and by extension, a citizen. Following the post is the still-unanswered note sent to council March 26, 2018 asking for an explanation of its position.

"It remains my sincere hope a better working balance can be found in Crowsnest Pass, one that includes all voices, all concerns, as this is what our democracy is founded on and what we all hold a duty of care for" -from my note to council

There's only five days now until the deadline for submission to the CEAA joint review panel. As mentioned, additional information will be posted to this page over next three days leaving the last two for processing, answering questions, and assisting folks from all sides of the equation in respecting our democratic process. At the end of it all, I will likely make my first fully-editorial, or if you prefer personal, statement as a citizen prior to my own submission. I felt this the best approach for one walking the fine line between journalism and activism as I really do my level best to keep my personal opinions out of the hard journalism.

Given the lack of regulatory oversight and the seemingly captive local power structure, grassroots voices will be important to insure a just result. Elsewhere on the page you will find an outline for your statement and a wealth of vetted information regarding many aspects of the file in support of this. Regardless of where you stand on the issue, please do your best to give an honest accounting of your information, thoughts, and feelings mindful of the greater good and respectful of our democratic process. We can do this folks, and do it well. -KT

Picture by Kevin Turner (taken early fall 2015 during a follow-up investigation) shows coal and other substances deposited on one adjoining landowner's property sourced from a spoils pile on the east flank of Grassy Mountain. This material was also deposited in Gold Creek (Critical Habitat for westslope cutthroat trout) and the Crowsnest River some 12 km downstream. To date, there has been no effort made to mitigate the damage to the private property or either stream that I am aware of. This, previously reported on the page and the subject of an upcoming report.

March 7, 2018 Note to Crowsnest Pass Council Including CNJ Post on the Topic:

Dear Mayor Painter et al,

Below you will find one of today's posts on my platform, "The Crowsnest Journal" found on Facebook in response to your repeated efforts to restrict my questions in council as a journalist. Please provide a written explanation supporting your decision to restrict my questions in council as a journalist that I may gain a better understanding of the expectations of the municipality in this regard.

I trust this information will help to improve our overall understanding of the rapidly changing face of Canadian journalism.

Be well,

Kevin Turner,
Crowsnest Journal

Press Freedom, Press Restrictions

Prior to the start of last week's presentation by Riversdale Resources to Crowsnest Pass council regarding the Grassy Mountain met-coal strip mine proposal, Mayor Painter removed me from the press table without explanation. When asked, "do you not believe me a member of the press?" the mayor responded by pursing his lips, closing his eyes, and shaking his head to, I assume, indicate no.

Shortly afterward Councillor Sygutek, owner and publisher of local print media, "The Pass Herald" entered the room informing the mayor her reporter was running late but would be along shortly. As promised, her reporter soon filled the now-vacant seat, but in the end, asked no questions of either council or Riversdale Resources.

Two years ago I was allowed to ask questions in council as a member of the press, what changed? Perhaps difficult questions are not welcome? Perhaps the mayor is unaware of the changing face of Canadian journalism? Perhaps some assistance is in order?

Beginning with the pictured link, these six articles provide an overview of the rapidly changing face of Canadian media and the value of journalism in a well-functioning democracy. I will provide this post to Mayor Painter, CNP Council, and the appropriate overseeing bodies in the hope of greater understanding by all involved.

Perhaps following that, I'll be able to ply the craft of independent public-interest journalism without unnecessary, potentially unethical restriction. -KT

Social Media now Dominates Canadian News: <https://ipolitics.ca/2017/02/07/facebook-nation-social-media-titan-now-dominates-canadian-news/>

94% of Canadians Believe Journalism is Important to Democracy:
<https://www.thestar.com/news/gta/2018/02/16/94-per-cent-of-canadians-believe-journalism-is-important-to-democracy-poll-finds.html>

Federal Budget on Non-Profit Media Models: <https://ipolitics.ca/2018/02/27/federal-budget-opens-door-non-profit-media-models/>

Do Gobs Want a Weak Media?: https://thetyee.ca/Mediacheck/2018/02/27/Why-Governments-Want-Weak-News-Media/?utm_source=twitter

On Digital News: <http://www.digitalnewsreport.org/survey/2017/canada-2017/>

On Social Media Marketing: <https://www.sherpamarketing.ca/blogs/canadian-social-media-stats-updated-2018-471>

PS: A report on the council meeting's content and the review body meetings held last week regarding the Grassy Mountain Project will be posted later this week on the page.

March 26, 2018 Follow-up Note to Crowsnest Pass Council:

Dear Mayor Painter et al,

I'm disappointed by the lack of formal reply to my request for an explanation regarding efforts to restrict my questions in council as a journalist found below. I was further disappointed, and disturbed on many levels both as a journalist and a citizen, by the response, "What Makes You a Real Reporter" provided by Councillor Sygutek through her media outlet the, Pass Herald found here: <http://passherald.ca/archives/180314/index2.htm>

The response expresses a high level of ignorance, willful or otherwise, regarding forms of journalism which do not reflect the, *Pass Herald's* approach to the craft by Publisher/Editor/Councillor Sygutek. Journalism is not about audits or, "formal" training, it's about an undying dedication to the truth and the public interest. Is it factual? Is it contextual? Is it in the public interest? These are the most important questions any journalist must ask themselves before considering any public dissemination of information as they speak to the core of the craft - ethics.

Ms. Sygutek's choice to weaponize her publication in response to my query to her as a councillor serves only to remind us all of why, "politician" and, "journalist" are hats that cannot be worn simultaneously. Just because Ms. Sygutek says it's ok as was done in her editorial of, October 18, 2017 following the municipal election, doesn't mean it is. Our community needs its print media; it saddens me both as a citizen and a journalist to see it imperilled by this obvious, avoidable conflict of interest. In this writer's opinion, this conflict impacts the credibility of our elected body to others, including the provincial government, and will ultimately bring harm to our community.

Through the, *Crowsnest Journal* and other undertakings, I've sought to bring attention to matters of public interest and to provide environmental and other forms of long-absent journalism in the Oldman headwaters. My work is accepted and acknowledged by a broad scope of the public who have provided a great deal of support for the work of public interest journalism. When the work uncovers issues which require the attention of government or industry, I pass the work along often with far more information than is provided publically. Interestingly, the only government body that has refused to acknowledge my work is my own municipal government.

I admire anyone who enters public service for the greater good; I have no specific axe to grind here. Several years ago, I explained issues surrounding westslope cutthroat trout to Mayor Painter and others including members of the Crowsnest Conservation Society at a Government of Alberta open house as junior staff were unable to answer the question accurately. Last year, while council was considering the OHV bylaw, I provided significant information to the municipality on the topic only to have it ignored. This was not done to restrict anyone's fun nor was it a result of any bias against the user group, it was simply a matter of understanding the liabilities the bylaw creates and wanting to insulate our community from any resultant difficulties. My work on the Riversdale Resources file is similarly motivated.

I've communicated with hundreds of Crowsnest Pass residents from all sides of equation regarding the Grassy Mountain strip mine proposal. Many within our community are of the opinion our elected officials have too cosy a relationship with Riversdale Resources and have not provided balanced leadership in this regard. The basis of this concern was perhaps no more apparent than at the January 4, 2018 presentation to counsel where elected officials openly defended the proponent during counsel question period before one counsellor handed the floor over to a member of the gallery for further testimony. This was not lost on the gallery as a whole and led to spirited discussion following the meeting among a number of attendees.

There will certainly be more issues in our community, more hard questions that need to be asked; in the absence of other forms of oversight, journalism can, and must, attend. Regardless of any response I may receive to this note, my work will continue, the truth will be doggedly pursued and once confirmed, will be placed in the public domain. It remains my sincere hope a better working balance can be found in Crowsnest Pass, one that includes all voices, all concerns, as this is what our democracy is founded on and what we all hold a duty of care for.

Be well,

Kevin Turner

Public Health and Cutthroat Concerns in Blairmore Creek



Blairmore Creek In Golf Course Near Highway Three April 13, 2017 About 16:00

Last spring, Blairmore Creek ran the pictured putrid orange for several days following the release of fluids from historic underground mine works on lands owned by Riverdale Resources/Benga Mining (RR/BM) just south of Grassy Mountain. In spite of the awareness of all who passed by the stream on Highway Three and of Riversdale Resources staff, no public notice of the release event was provided by the proponent or local government officials until after I became involved. The resultant public statement can be found at the end of this article.

To date, no significant action has been taken to mitigate the impacts to the stream, prevent a reoccurrence of the event or to mitigate ongoing concerns of potentially toxic discharges at this location and others.

While reading fresh statements of concern now available on the Canadian Environmental Assessment Agency (CEAA) website, I was struck by a number of Letters of Support touting the proponent's environmental sensibilities. I trust this article, when combined with previous and upcoming reports, will provide a more accurate accounting of RR/BM's approach to environmental concerns.

Significant work remains on this file and others including a 2015 release of coal from the east flank of Grassy Mountain which deposited coal spoils on an adjoining landowner's property and into Gold Creek and the Crowsnest River. I've been unable to finish work on these files due to health and financial concerns. I'm hopeful that with further grassroots support, I'll be able to complete this investigation before moving on to other historic mining concerns throughout the Crowsnest River Valley.

The protection of our most precious resource - water, simply deserves our best effort. Don't you agree?
-KT

Public Health and Cutthroat Concerns in Blairmore Creek (November 2017 Update)



Blairmore Creek/Crowsnest River Confluence April 13, 2017 About 16:00

November 24, 2017 I contacted Riversdale Resources/Benga Mining (RR/BM) for a comment regarding the issue below, " Ahead of the deadline for submissions to the AER regarding the mine's permit, and as suggested in my correspondence with the AER..., I'm looking for a public statement from Riverdale regarding the release including what, if any, steps RR/BM has taken to mitigate future events of this kind. I'm also interested in the toxicology report or a more contextually complete report than the one provided to local print media and CNP mayor and council" -From my Query to RR/BM

The initial response from RR/BM was to refer me back to the Alberta Energy Regulator (AER). After explaining their referral to RR/BM on the matter, I met with RR/BM staff Wednesday November 29 to discuss my concerns and clarify a number of questions regarding this and other files. I'd hoped to have a reply by this time to include in this post, but it has yet to arrive.

As with the 2015 release of coal and other substances into Gold Creek, (more on this in an upcoming post) I spent time trying to convince the AER of the need to list this on their Compliance Dashboard as an incident; the AER response:

"I appreciate your frustration with this situation. Benga Mining Ltd. (Benga) (Riversdale Resources) may be able to provide you with their water analysis data.

The Alberta Energy Regulator (AER) has reviewed the water quality analysis and has concluded that orange discoloration of water is not related to any coal exploration activities being conducted by

Benga. Our analysis of the water sample results indicates there is sufficient dilution to ensure there is no human or ecological concern within Blairmore Creek.

This occurrence of water discolouration is not classified as an AER emergency or AER incident and as such, will not be posted on the AER's Compliance Dashboard (The criteria that qualify incidents to be posted to the dashboard can be found under the "Incidents" tab).

Since this isn't an issue of current energy development, Alberta Environment and Parks (AEP) may be able to offer you more information. AEP's toll-free number is 1-877-944-0313, and the department's general inquires email "x" for further information." From the AER

My Reply: "Thanks for your timely response.

While I appreciate the AER's need to attend to process, I believe Riversdale Resources' reporting of the incident confirms this to be a reportable release in and of itself. The proponent has also confirmed the source to be historic mine works they now hold the responsibility and liability for. To my way of thinking this is no different than the 2015 release event into Gold Creek; if you recall it took weeks, and a firm prompt both from myself and a national news story, to find that incident listed on the dashboard.

Clearly, there is no possible way for this to be a natural event beyond the fact the water itself is naturally occurring. Had that water not passed through the historic mine works, it would not have encountered the oxidized rock responsible for the discolouration. It is most likely this water contains dangerous concentrations of heavy metals as well. It's the confirmation of toxicity that we are waiting on, not confirmation of an incident if I am reading the reportable release brochure correctly.

As I advised the proponent on Monday, a simple holding pond and sediment barriers done upon the discovery of this release would have prevented most of the ongoing entrainment of a deleterious substance, reduced the liability to the proponent, and provided best-practice protection to the watershed. The cost of this work would have been quite minimal given the protection it could provide. It would also serve to build confidence in both the regulatory process and the proponent itself.

Please forward this along to the decision makers for reconsideration of the matter's status as a reportable event and provide a response once reviewed." - I have yet to receive a response to this from the AER.

Clearly Albertans and residents of Crowsnest Pass deserve a more robust and forthright response from the regulator (AER), all levels of government, and the proponent (RR/BM) to events of this nature. To the best of my knowledge, no action of any kind has been taken to mitigate the results of this release or to prevent future events of this kind. Like the 2015 release into Gold Creek, it seems no one is to blame, no one is responsible, and no one will be held accountable. Is this the Alberta Advantage, industrial subsidy by denial of impact? We can do better than this Albertans, much better. -KT

Public Health and Cutthroat Concerns in Blairmore Creek (Original Posted April 17, 2017)

On Thursday April 13, 2017 Blairmore Creek, a tributary to the upper Crowsnest River and home to "Threatened" Westslope Cutthroat Trout including a federally ordered Critical Habitat section, turned a putrid orange as a result of discharge from a historic mining installation near Grassy Mountain in MD Ranchlands #66. The stream flows south from this location into the Municipality of Crowsnest Pass before reaching its confluence with the Crowsnest River.

Benga Mining, operating as Riversdale Resources, has been doing exploratory and permitting work in the area since 2014 with an eye to redeveloping the historic metallurgic coal strip mine on Grassy Mountain. Riversdale confirms the location to be a spring expressing from the abandoned Beaujolais Mine which drains directly to Blairmore Creek near the southwest flank of Grassy Mountain. The

proponent informed the Alberta Energy Regulator (AER) the morning of the 13th while my investigation began that afternoon upon my direct observation of the creek.

Speaking with AER following initial sampling and recording I was disappointed to learn no emergency phase had been ordered by the regulator as the potential for public health concerns, fish mortality, and a host of other issues is, and remains, high. Beyond the potential for mechanical injury to our native salmonids, the water discharged from the old mine working is likely to contain significant levels of heavy metals including selenium and mercury.

The discharge, similar to an ongoing issues with historic mine sites along McGillivray Creek, is most likely a result of hydrological forces acting on underground mine works which drives the water in the old shafts to the surface through the path of least resistance. In speaking with Riversdale Resources this morning, I suggested a temporary holding pond with layers of sediment barriers at the point of discharge from the pond, may mitigate current and future concerns as the spring melt continues. McGillivray Creek suffered a similar, albeit smaller, discharge earlier this month. This event will be the subject of a separate report once my investigation is complete.

I have sampled the creek every afternoon since the initial event and can report water conditions have visually improved since last Thursday. Water testing by Riversdale Resources is underway, the results are due later this week. Regardless of the outcome of this testing, I believe a more robust response from the regulator and the proponent similar to the response to a recent spill into the Thomson River in British Columbia could have prevented further potential damage to Critical Habitat, watering wildlife and cattle, and public health following the release.

This note and other information will be now be filed to the Department of Fisheries and Oceans Canada through the Species-At-Risk department as well as Environment Canada, the AER, and other provincial and municipal government agencies. I encourage all concerned to contact their local officials and the above noted agencies to encourage best practice in the mitigation and remediation of this unfortunate event. I'll provide regular updates on the page as the information becomes available. -KT

Riversdale's Statement posted to the Municipality of Crowsnest Pass' Facebook Page Thursday April 13 around 15:45:

“On the morning of April 13th, 2017, Benga Mining Ltd observed a temporary discoloration occurring in Blairmore Creek. We have investigated the source of the discolouration and found it to be coming from a groundwater spring discharging from the old underground workings at the abandoned Beaujolais mine site. ...Groundwater typically flows from the old underground workings and drains into Blairmore Creek. The discoloration in the water is due to a natural process of naturally occurring bacteria reacting with iron in the groundwater to produce a reddish colour when it is released at the surface and exposed to air. A similar iron discolouration occurs in residential water wells. Benga Mining has reported the situation to the Alberta Energy Regulator and will continue to monitor the situation to verify there is no risk to human health or the environment.”

Compare and Contrast:

Thompson River Event:

<http://www.news1130.com/.../dont-drink-water-interior-health.../>

<http://www.news1130.com/.../new-tests-on-river-water-after-c.../>

AER Compliance Dashboard (awaiting

update):<http://www1.aer.ca/compliancedashboard/incidents.html>



Blairmore Creek April 16, 2017 About 16:00 Deposition From Release Event



Blairmore Creek April 16, 2017 About 16:00



BC April 2017 Samples Sediment



BC April 2017 Samples Mixed

Riversdale Coal Rips Apart Community

The lead, a 2012 letter to the editor of the, Mat-Su Valley Frontiersman, is a heartfelt account of one person's, and one Alaskan community's experience with Riversdale Resources. It describes many of the tactics and behaviours reported on this page and elsewhere as the firms seeks to secure a permit to reopen the historic met-coal strip mine on Grassy Mountain to the north of Crowsnest Pass, Alberta.

Letter to the editor: https://www.frontiersman.com/opinions/spectrum/riversdale-coal-rips-apart-community/article_940a91fc-c4b7-11e1-b3b8-0019bb2963f4.html

Additional information regarding Riversdale Resources' operations in Alaska can be found here: <http://www.groundtruthtrekking.org/Issues/AlaskaCoal/ChickaloonCoalMine.html>

One Alaskan was so concerned by Riversdale Resources/Benga Mining (Benga the Alberta iteration) interest in Crowsnest Pass they contacted a local blogger with their concerns. That conversation can be found here: <http://johnprince.ca/wpblog/chickaloon-resident-speaks-out-to-me-on-riversdale-2013-01-25/>

Early efforts by the firm in Crowsnest Pass and other international concerns were reported last week on this page within this post: <https://www.facebook.com/thecrowsnestjournal/posts/1452374448230850>

A review of Riversdale Resources' website now finds no mention of the Alaskan proposal, but does reflect of the strategies spoken to in the letter to the editor. Interestingly, a number of recently-filed submissions to the Canadian Environmental Assessment Agency (CEAA) also reflect the approach voicing support for that which cannot be factually or ethically supported.

Riversdale Resources: <http://www.rivresources.com/site/content/>

CEAA Grassy Mountain Project Page: <https://ceaa-acee.gc.ca/050/evaluations/proj/80101?culture=en-CA>

The deadline for submissions to the Joint Review Panel is Monday January 21, 2019 folks. Please find the time to raise your voice folks regardless of your position on the proposal. To my way of thinking, our regulatory systems, and our democracies, work best when all voices are heard for all hold a lesson and all are required to insure the most just and responsible result. -KT

The Sunday Collection: Coal's Toxic Legacy

These three videos: the lead from, PBS, two from the, New York Times, and a, Desmog Canada report on water quality issues regarding the Elk River in B.C. remind us there's still work to be done protecting land, water, and people in coal country. The NYT videos are particularly moving, especially so for folks with small kiddos.

Appalachia had at least a seventy-year head start on Crown of the Continent coal mining; the toxic legacy it's now dealing with informs one possible future for our streams and the public health concerns which could result. The videos provide straight talk from the folks who are living the legacy today; their stories, while difficult to hear, are more important than ever, especially to a community like ours considering a new mining proposal.

Following a, Calgary Herald article earlier in the week regarding Riversdale Resources' application to reopen the historic met-coal strip mine on Grassy Mountain near Crowsnest Pass, a number of good conversations took place on this and other local pages. Unfortunately, some folks are not well informed leading to a number of false statements and general misinformation being presented regarding Teck and the Elk Valley mines.

From PBS: <https://www.pbs.org/newshour/show/mountaintop-mining-affects-life-landscape-west-virginia?fbclid=IwAR0tq-BpwVTfu-6lkmeUa6XsMp7GTR0oIbOhXO7-ubXdqpCnEljyQMzEoU>

The Calgary Herald Article: https://calgaryherald.com/business/local-business/australian-company-proposes-700m-coal-mine-reviving-historic-industry-in-crowsnest-pass?fbclid=IwAR0o_cWUKISjWdOpwui9DUheTEqhacBZePs5E6zFXI2Q1nZPYPvHRBqrPkg

The, Desmog Canada article found here should help clear the air:

https://www.desmogblog.com/2018/07/31/canada-us-governments-not-intervening-coal-mine-pollution-selenium-controversy?fbclid=IwAR2Vqu4CCaZxO0IInaU8LkbgXMIK7Ss1uvob3a74_usPySXNdAxXDn-qO9w

NYT video 1: https://www.nytimes.com/video/us/1247464506260/toxic-waters-coal-in-the-water.html?fbclid=IwAR39WEzoaZjQr90tppaFEGHfNNcKW8H4-wFfUX53LkF3nj_dENDRaGNcrA

Nyt video 2: https://www.nytimes.com/video/opinion/100000006064751/coal-miner-to-trump-coal-mining-isnt-coming-back.html?fbclid=IwAR0egv8shUQoDr7hizuAnyJmDSTn5E_pk9k4Ymj0mQW_cpQ8RPDCJbDeNuk

Regardless of where you stand on the issue, it's important we're all working from the most accurate and complete information possible as misinformation and spin serve only to confuse folks and drive wedges in at a time our community needs to come together to plan its future. Find your voice folks, but do make it an informed voice so we can all get on with the business of making this an even more wonderful place to live, work, and play. Be well All. -KT