

May 30, 2023

[www.aer.ca](http://www.aer.ca)

By Email Only

Robb Price

**Statement of Concern No. 32227  
Bonavista Energy Corporation (Bonavista)  
Application No. 32127722**

Dear Robb Price:

You are receiving this letter because you filed a statement of concern (SOC) on behalf of James River Retreat Landowners about Application No. 32127722. The Alberta Energy Regulator (AER) has reviewed your SOC, along with the application, and all applicable requirements and other submissions or information about the application. The AER has decided that a hearing is not required to consider the concerns outlined in your SOC.

In our review of your concerns, we considered the following:

- Regarding the concern around potential impacts to nearby water sources and possible water well contamination, Bonavista must comply with AER requirements that surface casing be set and cemented to a depth that is intended to protect the deepest aquifer, as specified in *AER Directive 008: Surface Casing Depth Requirement* (Directive 008). The AER notes that in addition to AER Directive 008, Bonavista must follow all other relevant AER Rules and meet AER requirements including those specified in *AER Directive 009: Casing Cementing Minimum Requirements*.
- Regarding concerns around the Key Wildlife Biodiversity and Grizzly Zone, AER staff have reviewed the mitigation measures that Bonavista has included in its application and notes that Bonavista has identified it will be operating within the area appropriately. Additionally, Bonavista has committed to conduct work outside the restricted activity period, therefore, this concern has been addressed to the AER's satisfaction.

- With respect to traffic concerns, these concerns relate to matters outside the AER's jurisdiction and should be directed to Alberta Transportation or the appropriate municipal authority.
- With respect to project notification concerns, the AER confirms that Bonavista met all participant involvement requirements for this *Public Lands Act* application prior to its submission.
- Concerns regarding cumulative impacts and future development are beyond the scope of the current application. As per *Directive 056: Energy Development Applications and Schedules*, Bonavista is required to include the SOC filers in its participant involvement notification program for any future infrastructure applications in the area, and to notify them when those applications are submitted. Should you wish to do so, you can submit a SOC at that time.
- The AER acknowledges concerns related to property value, forest impacts and cross county borders however, these concerns are general in nature and there is insufficient information to determine if you or any James River Retreat landowners would be negatively affected by the proposed project.

Based on the above, the AER has concluded that it is not necessary to hold a hearing before making a decision on the application. The AER has issued the applied-for licence, and this is your notice of that decision. A copy of the licence is attached.

All AER-regulated parties must comply not only with the conditions of their authorizations, but with all of the AER's regulatory requirements. To ensure industry compliance the AER has developed its *Integrated Compliance Assurance Framework*, which embodies the three main components of all effective compliance assurance programs, those being education, prevention, and enforcement. You can find out more about how the AER verifies industry compliance and responds to noncompliance here: <https://aer.ca/regulating-development/compliance/compliance-assurance-program>.

You may file a regulatory appeal on the AER's decision to issue the licence if you meet the criteria within section 36 of the *Responsible Energy Development Act*. Filing instructions and forms are located here: <https://www.aer.ca/regulating-development/project-application/regulatory-appeal-process>.

If you have any questions, please contact [SOC@aer.ca](mailto:SOC@aer.ca).

Sincerely,

<Original signed by>

Lane Peterson  
Director, Oil & Gas Surface  
Regulator Applications

/as

Attachment (5): Licence

cc: Mark Unrau, Bonavista Energy Corporation  
SOC Inbox, AER  
Mike Taylor, AER  
Field Operations West, AER