

**From:** [Cheryl Bradley](#)  
**To:** [SOC](#)  
**Cc:** [rcheyne@graniteoil.ca](mailto:rcheyne@graniteoil.ca)  
**Subject:** SOC, Granite, AER Applications 1885444, 1885437, 1885446  
**Date:** Friday, May 05, 2017 2:56:53 PM  
**Attachments:** [Letter 2017 05 MRR Drilling AER.pdf](#)

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Dear Sir or Madam:

Please find attached a Statement of Concern from the Southern Alberta Group for the Environment regarding applications 1885444, 1885437 and 1885446 by Granite Oil Corp. to drill oil wells on the Milk River Ridge.

Sincerely  
Cheryl Bradley, Secretary, SAGE  
(403)328-1245

[www.sage-environment.org](http://www.sage-environment.org)



**A leading voice for a healthy and environmentally sustainable community**

Box 383 Lethbridge AB T1J 3E9

5 May 2017

Alberta Energy Regulator  
Authorizations Review & Coordination Team  
1000, 250 - 5 Street SW  
Calgary Alberta Canada T2P 0R4  
By Email: [SOC@aer.ca](mailto:SOC@aer.ca)

Dear Sir or Madam:

Re: Statement of Concern, Granite Oil Corp.  
AER Applications 1885444, 1885437 and 1885446  
Sec 8 Tp 3 Rg 18 W4 and Sec 17 Tp 3 Rg 18 W4

Southern Alberta Group for Environment (SAGE) is writing to express concern with applications 1885444, 1885437 and 1885446 by Granite Oil Corp. to drill oil wells on lands identified by the Government of Alberta for protection under the South Saskatchewan Regional Plan (2014-2024). We request that AER deny these applications and that there be a moratorium on surface access for exploration and development within the proposed addition to the Twin River Heritage Rangeland Natural Area on the Milk River Ridge.

SAGE, a non-profit society established in 1984, is a leading voice for a healthy and environmentally sustainable community through informing citizens, participating in public processes and supporting sound environmental initiatives and actions. Through consultations on the Special Places Program (1993-2000) and the South Saskatchewan Regional Plan (2010-2013) SAGE has advocated for expansion of conservation areas in grasslands, including on the Milk River Ridge, to meet provincial protected area network targets and to accomplish the objective of maintaining biodiversity. The lands on which drilling is proposed are included in one of only two grassland conservation areas outside of the foothills identified for protection in the South Saskatchewan Regional Plan.

We have previously expressed our concern about proposed drilling on these lands by DeeThree Exploration Ltd. (a precursor to Granite Oil Corp.) in letters addressed to Hon. Ken Hughes, Minister of Energy (Sep 13, 2013), to Hon. Jim Prentice, Premier of Alberta (Apr 9, 2015) and to the Alberta Energy Regulator, Stakeholder and Government Relations Division with cc to Martin Cheyne with DeeThree (Apr 9, 2015). In the latter correspondence we asked to be informed of any application that the Alberta Energy Regulator (AER) receives regarding drilling on public land in this parcel (Tp3-Rg18-W4). We learned about the current application, not through AER or the proponent, but through a conversation with a fellow conservationist. SAGE has concerns about approval of any application for industrial development in this area because of potential adverse effects on significant natural features. Approving an application to drill would undermine government intent for protective designation of the area. We assume that this application is being treated as non-routine by AER.

There are few large blocks of native grassland left in Alberta, and what native grassland does remain is largely fragmented and insecure, and less than two percent lacks clear government protection. Native grassland constitutes only about five percent of the provincial land base, and yet supports approximately half of the rare ecological communities, 40% of rare vascular plant species and 70% of mammal, bird, reptile and amphibian species considered at risk or may be at risk. The native prairie ecosystem on the Milk River Ridge has intrinsic value and provides ecological services to Albertans such as water storage, carbon capture, sustainable ranching, and biodiversity conservation. These public lands are covered by a Protective Notation because of their importance for rough fescue communities, wetlands and wildlife and their sensitivity to disturbance. The high-value wetlands merit protection from threats under the Alberta Wetland Policy.

In addition, the shale oil play in southern Alberta has raised significant concerns. Horizontal drilling with intensive hydraulic fracturing has come under close international scrutiny since its development and application. Fugitive emissions from flow back water and problems with wellbore integrity pose risks to air quality, as well as surface water and groundwater. Water contamination is of particular concern for the area proposed for oil drilling on the Milk River Ridge as it contains headwaters for both the Milk and the South Saskatchewan River watersheds. Construction of well sites, access roads, and pipelines, as well as ongoing operations in the area, will have long term negative cumulative impacts for wildlife and native grasslands that we do not know how to restore.

We understand that Granite's leases are due to expire in just over a month (June 14, 2017). We believe the leases should not be renewed. It appears that Granite is seeking hasty approval prior to lease expiry without full consultation or hearing to understand and address issues raised by concerned parties.

We have communicated with members of the ranching community in the area and understand that they share our views. We request that AER respect the outstanding stewardship practiced by the grazing leaseholders in this area as well as the protection intent of the South Saskatchewan Regional Plan by denying Applications 1885444, 1885437 and 1885446.

Yours sincerely

A handwritten signature in black ink, appearing to read "Cheryl Bradley". The signature is fluid and cursive, with the first name "Cheryl" written in a larger, more prominent script than the last name "Bradley".

Cheryl Bradley, Secretary  
Southern Alberta Group for Environment  
Phone: (403)328-1245  
Email: [cebradley@shaw.ca](mailto:cebradley@shaw.ca)

cc: Granite Oil Corp. Attention: Ryan Cheyne via email: [rcheyne@graniteoil.ca](mailto:rcheyne@graniteoil.ca)