



20 April 2012

Manitoba Conservation and Water Stewardship
Box 11, 200 Saulteaux, Wpg, MB
R3J 3W3

Attention: Mr. Bob Betcher, Manager, Groundwater Management Section

Re: Proposed New Groundwater and Water Well Act: Discussion Paper

Dear Sir,

After reviewing the above referenced Discussion Paper, AMEC Environment & Infrastructure would like to make the following comments/questions:

1. Are horizontal wells included in the Proposed Act? What about horizontal geothermal systems?
2. The Act would seem to need a set of definitions that could be referenced when reading the remainder of the document. For example, for the purposes of the Proposed Act, what is defined as an aquifer, well, hole, monitoring well, and contamination.
3. Is a geotechnical test hole now being classified as a well? There seemed to be inconsistency in the use of the terms 'hole' and 'well' throughout the document.
4. Under Licensing and Certification, the Proposed Act does not appear to address Environmental test holes and monitoring wells, for example in Sections "Issue" and "Proposed Changes".
5. Under Management and Protection of Groundwater, Section "Proposed Changes", the Proposed Act indicates that drilling must be halted if contamination is recognized until permission is received from Manitoba Conservation and Water Stewardship. How will this apply to Environmental drilling of test holes and monitoring wells where the purpose is to find the lateral extent of contaminants in the soil and groundwater? What is the definition of contamination in these cases?
6. Under Well Drilling, Construction and Sealing Standards, we would like to see more detail on the requirements for sealing a well, so the associated cost could be determined. The increased cost would potentially need to be passed along to our client and therefore there should be a consistent approach as to how a well is to be sealed.

Thank you for the opportunity to comment on these changes.

Sincerely,
AMEC Environment & Infrastructure

A handwritten signature in cursive script, appearing to read "Allyson Desgroseilliers".

Allyson Desgroseilliers, P.Eng.
Manager, Winnipeg Operations

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