

Sent: Thursday, April 29, 2010 9:55 AM
To: Living Water Smart ENV:EX
Subject: Water Act Modernization Discussion Paper Feedback

Below is the result of your feedback form. It was submitted by
() on 2010 04 29, at 09:55:29

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ContactMethod: Email

Principles_Support: Strongly Disagree

Principles_Comments: Recommend that First Nations be deleted from the proposed principles (item 2). We understand and appreciate the need to be inclusive of First Nations. However, they should be no different than any other stakeholder in terms of water rights. Also, putting First Nations at number 2 implies that their concerns are more important than science-based decision making.

Goal1_Support: Support

Goal1_Comments: Points 1 and 2 should be clarified to say â freshâ water allocation decision

EnviroFlow: Guidelines

WaterAllocationPlan: Optional

DecisionMaker: Must Consider

WaterAllocationPlan_Conditions: Flexibility is necessary, to allow for consideration of natural variability.

-Should only pertain to non saline groundwater. Recommend that saline groundwater be exempt.

DumpingProhibition: Maintain

DumpingProhibition_Comments: Federal guidelines already govern water quality criteria, and should supersede any provincial mandate.

Goal2_Comments: There is a need for clarification of roles. Industry needs certainty in decision making, by a centralized approach.

Goal2_Options: Centralized

ScaleForWatershedPlanning: A basin scale is recommended.

GovernanceFundingSolutions: Recommend that a government resource should be funded by government.

Accountability: A delegated or shared approach is not preferred.

BenefitsOfSharedRoles: Any benefits realized by shared roles would be far outweighed by a bogging down of the bureaucratic process. This role needs to be centralized, without question.

Goal3_Support: Disagree

Goal3_Comments: Too much flexibility leads to uncertainty. This uncertainty will discourage large capital investment.

WaterUseEfficiency_1: Codes for efficient infrastructure and practices

WaterUseEfficiency_2: Use of incentives and economic instruments

AdminEfficiencyOptions_PermittedUse: Permitted use different

AdminEfficiencyOptions_SelfReg: Required self-registration

PermittedUseConsiderations: The type of water source should be considered â non potable water should not require a license. Controls should be in place for potable water extraction only.

AdminEfficiencyOptions_WaterUse: Measure and report actual water use

Flexibility_Support: Support

WaterAllocationSystem_Options: FITFIR

WaterScarcityTemporary_Options: Priority date

WaterScarcityPermanent_Options: Water Management Planning upon request

Goal4_Support: Disagree

Goal4_Comments: Saline groundwater needs to be exempted. Statement should state
â potableâ groundwater extraction and use is regulated.

Thresholds_Options: 250+100

Thresholds_Comments: The use of thresholds is beneficial for aquifer protection.
However, science-based determination of aquifer yields should be considered to
determine appropriate thresholds for a given region.

PriorityAreas_Options: Hydraulic connection

PriorityAreas_Comments: Option C is preferred. However, recommend that saline
groundwater be exempt from this clause.