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Nov. 14, 2013

B.C. Ministry of Environment

Attention: Lynn Kriwoken.

Regarding the Water Sustainability Act:

Thank you for allowing input on this timely and vital upgrade to the current Water Act in the form of a new Water Sustainability Act.

Areas of concern are as follows.

- 1) While the proposed act does touch on the need to more closely link surface water and ground water, it does not seem to address huge problems created by the diffuse and confused existing regulations which have surface water, ground water, storm water, and waste water covered by multiple ministries and dozens of regulations. All of these "different" waters are intimately linked and to a great extent ought to be encompassed in a single act under a single ministry to truly protect aquifers and ecosystems.
- 2) Current regulations allow storm water, and process water to be directly injected into freshwater aquifers with no recourse unless "proof of harm" exists. But of course by the time there is proof of harm; fresh water aquifers may be permanently compromised to the point of being unfit for human consumption.
- 3) There does not seem to be any intent to address the shortcomings of the Riparian Area Regulation. In its' current form, it continues to enable the slow by steady destruction of precious and vital shore line and wet lands while local governments which lack the necessary backing, support, and resources can do little but bear witness to this slow but continual decline.
- 4) Dozens of highly qualified and motivated volunteers are anxious to see their watersheds managed in a way that will quickly respond to the needs of the citizens and the environment in these times of development pressure and changing climate. It seems that the best way to achieve this end would be to grant local control within reasonable parameters to groups such as the Cowichan Watershed Board who live work and play in the watershed, and who represent the interests of the vast majority of citizens including first nations, as well as thriving fish populations and healthy ecosystems.
- 5) Local control must come with support both financial and political. Water licenses fees for surface and ground water could be a way to fund the operations and works undertaken by local watershed authorities.
- 6) Aquifers and watersheds need extremely high levels of protection from pollution and contamination, and commercial gain cannot continue to take precedence over absolute protection of our water resources. In areas of uncertainty, a strong dose of precautionary principal in favour of resource protection must be applied.
- 7) Hydro-fracturing for oil and gas should only be allowed in areas where no freshwater aquifers are known to exist. If aquifer information does not exist, no hydro-fracturing should proceed until absence of aquifers is proven. The time may come when northern aquifers become vital resources for our grandchildren as climate change progresses.
- 8) Minimum depths for oil and gas hydro-fracturing should be established to limit risk to surface water and fresh water aquifers. Such depths should be no less than 1,000 metres.

Thank you again for the opportunity to participate in this process. I look forward to further participation, and to seeing a new Water Act that will sustain our resources and our environment for the benefit of generations yet to come.

Sincerely:
David Slade
Well Driller and Grandfather
Cobble Hill BC.