



November 15, 2013

Water Sustainability Act
Ministry of Environment
Water Protection and Sustainability Branch
PO Box 9362 Stn Prov Gov
Victoria BC V8W 9M2

Sent via e-mail: livingwatersmart@gov.bc.ca

Dear Sir or Madam:

Re: A Water Sustainability Act for B.C. Legislative Proposal

Quicksilver Resources is heavily involved in developing the gas reserves of the Horn River Basin. The shales of the Horn River Group need to be hydraulically stimulated to enhance permeability so that the gas can move from the shale matrix into the wellbore. This process involves the use of significant amounts of both sourced and recycled water, and hence a workable, well defined, regulatory regime which allows us access to water with a high degree of certainty is critical to the success of our project. To this end we support CAPP's feedback to the *Legislative Proposal* especially with regards to the proposed definition of saline groundwater. An important potential source of water is the Debolt which normally has salinities in the ~20,000 mg/L range but in our portion of the basin occurs above the proposed 600m cut off depth. The water often also contains minor amounts of H₂S and hydrocarbons and is not suitable for human or livestock uses. Additionally the Debolt is not connected to the fresh/potable groundwater system and hence should be exempt from the Water Sustainability Act.

Sincerely,

Mick Somerwil, PGeol., PGeo.
Geology Manager,
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