



21 March, 2011

The Honourable Christy Clark,
Premier of British Columbia,
Box 9041, Stn Prov. Govt
Victoria, BC V8W 9W1

Dear Madame Premier,

Re: Shale Gas Development in British Columbia

BC Nature is a province-wide federation of naturalists clubs and individual members with approximately 4,500 members. Our mandate is to foster greater knowledge and appreciation of British Columbia's natural heritage and to protect the integrity of our Province's diverse ecosystems.

We are becoming increasingly disturbed about the rapid expansion of shale gas development in the Horn River Basin, Liard Basin, Cordova Embayment, and Montney Basin in northeastern British Columbia. Our concerns include the following:

- the impacts on water supply and quality in this region;
- the reported absence of any need for companies involved to reveal all the chemicals used in the hydraulic fracturing ("fracking") process;
- insufficient understanding of the hydrology of the region, especially insufficient information on groundwater;
- absence of regulations to limit the amount of water available for shale gas development;
- lack of any meaningful cumulative assessment of impacts;
- the impacts on the ecosystems of the areas affected – particularly those hitherto minimally developed – from the major alteration of habitat that occurs from extensive shale gas development.

It is sobering that the Auditor-General, in his 2010 Audit of the management of groundwater resources in British Columbia, concluded that the government's information on groundwater was "*insufficient to ensure the sustainability of the resource*"; and that groundwater was not being "*protected from depletion and contamination or to ensure the viability of the ecosystems it supports*".

Some recent comments by industry and British Columbia government representatives on the decision of the Quebec government to halt shale gas development in that province, until studies can determine whether shale gas development there can be carried out in a socially and environmentally responsible manner, have emphasized that British Columbia has more experience and stricter regulations than Quebec. For example, in Gordon Hamilton's March 14 article in the Vancouver Sun, *B.C. Shale gas holds promise of new era in resource investment*, British Columbia's Minister of Energy at the time, Steve Thomson, is quoted as saying: "It makes sense for Quebec to take a prudent approach as *they do not have the background and regulatory structure in place like we do*" (our italics).

British Columbia does have regulations for the oil and gas industry. However, the BC Oil and Gas Activities Act (OGAA), in essence pays only lip service to environmental protection, which is left to the discretion of the Lieutenant-General. Furthermore, how can shale oil development in British Columbia be developed responsibly in the absence of adequate understanding of groundwater hydrology, and in the absence of industry disclosure of all the chemicals used in fracking, as well as the absence of adequate understanding of the ecosystems impacted?

We recognize that the area of concern for shale oil development in Quebec is more densely populated than northeastern British Columbia. However, as the US Environmental Protection Agency has recognized, there are other concerns besides those relating to human drinking water supplies. These include air quality, aquatic and terrestrial ecosystem impacts, and seismic risks.

Abundant fresh water and healthy ecosystems are essential for the long-term well-being of human society and must not be sacrificed to short-term financial profit. We urge you:

1. to put shale gas exploration and production in this province on hold; and
2. to embark on a full evaluation of the risks involved in shale gas development to determine whether and how it can be carried out, while at the same time protecting ecosystem integrity.

We look forward to hearing from you regarding your decision and the reasons for it.

With congratulations on becoming Premier of our beautiful province, and looking forward to working with you to protect our rich natural heritage.

Sincerely,



John Neville
President

cc

The Honourable Rich Coleman, Minister of Energy and Mines Energy.Minister@gov.bc.ca

The Honourable Steve Thomson, Minister of Forests, Lands and Natural Resources, pro.minister@gov.bc.ca

Honourable Terry Lake, Minister of Environment, Env.minister@gov.bc.ca

The Honourable Blair Lekstrom, Minister of Transportation and Infrastructure and MLA Peace River South
Blair.Lekstrom.MLA@leg.bc.ca

MLA Pat Pimm MLA Peace River North pat.pimm.mla@leg.bc.ca

Opposition Environment Critic Rob Fleming Rob.Fleming.MLA@leg.bc.ca

Opposition Energy Critic Doug Donaldson doug.donaldson.mla@leg.bc.ca

Oil and Gas Commission Board of Directors, c/o CEO Alex.Ferguson@gov.bc.ca