



c/o Box 1270
Comox, BC V9M 7Z8
June 27th 2011

Rachel Shaw, Project Assessment Manager
Environmental Assessment Office
PO Box 9426 Stn Prov Govt
Victoria BC V8W 9V1

Project Manager: Andrew Rollo
805 - 1550 Alberni Street
Vancouver BC V6G 1A5
Telephone: 604-666-2431
Fax: 604-666-3493
Email: Andrew.Rollo@ceaa-acee.gc.ca

RE: The Raven Coal Mine proposal draft AIR

Please publish this response as Comox Valley Water Watch Coalition, Comox Valley, BC

Comox Valley Water Watch Coalition wishes to state that so far the draft AIR for the Raven coal mine does not propose to answer the questions about water we have been posing for at least two years. The draft AIR should be amended to include comprehensive independent peer reviewed aquifer mapping, of all aquifers in and adjacent to the coal tenure, at all depths. A full water interaction mapping, surface and aquifer, for the entire area of the mine's operations should be required, including the areas of the Bear mine and the Tsable River. This is especially important since aquifers adjacent to the mine workings and possibly even included in the mine workings (who knows without mapping?) are classified as vulnerable.

We want to know how much water the mine will use, where it will get it, and where it will put it once it is contaminated. We have been asking for two years, "How much water does it take to wash a tonne of coal?" In other words, we need to see a detailed plan of the mine and proposed use and management of water, and in particular the aspects concerning the prevention of acid mine drainage.

We want to know what happens to the water after it is used, and the method of sequestering it. The draft AIR must also include details about the actual method of water decontamination proposed. It is not that easy to "clean" water. We also want to know what will happen to the residue after the water is "cleaned." Where and how will the "sludge" or residue be stored, and how will the security of that storage be ensured for hundreds of years? Contaminants of concern that should be addressed include arsenic, cadmium and thorium, as well as the assorted salts.

We attach the letter we sent to Compliance Coal in December 2009 asking these same questions. Given the history of mines in this area, we also believe that a methane management plan, in particular methane capture and re-use, must be included in the mine plan.

We believe that the only way we will get answers to these questions, and achieve environmental protection, is to have a full panel review with public hearings. We ask you to listen to public opinion and recommend such a process to the Ministers.

Further, we believe that the Bear mine should be included in this AIR for two reasons:

- 1) President John Tapics told the Community Advisory Committee, during a site tour, that the coal from the Bear mine would be processed at the Fanny Bay site, and therefore all the water requirements of that mine should be calculated for the Raven mine site.
- 2) The Bear mine is included in financial statements calculating the share value of the company, (See page 6 "**Raven and Bear Projects**") and thus it is obvious that the value of the company and the financial viability of this mine is dependent on exploiting the Bear resources. If those resources are exploited we have the word of President Tapics that they will be processed at the Raven site.

Respectfully,

Delores Broten, for the Steering Committee of the Comox Valley Water Watch Coalition