

B. C. TAP WATER ALLIANCE

Caring for, Monitoring, and Protecting
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Supply Sources

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Should Fracking Be Allowed in British Columbia / Is Fracking “Sustainable”? A Response to the Stream to Steam Study

November 28, 2012

On November 15, 2012, the British Columbia Polis Project on Ecological Governance (University of Victoria) and the Canadian Centre for Policy Alternatives (headquartered in Ottawa, Ontario) released a peer reviewed and critical report on fresh water governance use in British Columbia, *From Stream to Steam: Emerging Challenges for BC's Interlinked Water and Energy Resources*.¹

I would like to add some comments and suggestions on statements and recommendations made in this report, particularly as they relate to the petroleum industry and the thematic use of water for fracking (hydraulic fracturing).

As an introductory comment, since the release of our November 2010 report, *Encana's Cabin Not So Homey: Cumulative Environmental Effects, an Unfolding Emerging Crisis in Northeastern British Columbia's Shale Gas Plays, An Introductory Journey into BC's Dirty Domino Zone*,² I am pleased to note that the *Stream to Steam* study has incorporated the land use planning concepts of “cumulative effects”, “cumulative impacts”, and “cumulative environmental impacts” throughout. This is critical, because, as it relates to life-cycle petroleum activities in northeast BC, it has, shamefully, yet to occur. It hasn't occurred since the introduction of deep shale fracking began some seven or so years ago in the major fracking plays (if not earlier, related to Coalbed Methane fracking), because the BC Liberal government failed to implement rigorous and conscientious public involvement planning. And, this should remind us of this administration's legacy since 2001, the wholesale revision and removal of environmental legislations and planning, a fundamental problem in the administration of, and the obstruction of public involvement, regarding public and private lands in BC. (One need only contemplate the controversial passage of **Bill 30** in 2006 during the Run of River hydro-electric developments, to prevent and muzzle Third Order (regional and local) governments from land use decision-making.³

The fundamental question that needs to be asked is:

should fracking be allowed in British Columbia?

¹ <http://www.policyalternatives.ca/water-energy>, or <http://poliswaterproject.org/publication/503>.

² <http://www.bctwa.org/FrkBC-EnCanasCabin-Nov9-2010.pdf>

³ For instance, refer to page 16, *Independent Power Production, Run-of-River Small Hydro and the Pitt River Power Cluster*, by Gareth Duncan, with comments on *Bill 30*, the *Utilities Commission Act*.

Everything else is moot, along with the attendant questions of:

- should any water be used for fracking?;
- should water be removed for fracking from the hydrological cycle?;
- and what should the price charged for using water for fracking be?

This critical consideration - should fracking be allowed in British Columbia - is what is missing from the *Stream to Steam* study. It seems as though the study considers the possibility that fracking is otherwise absorbed in the “sustainable use” and “sustainable management” concepts within land use governance and reform. In this sense, the report does not go far enough to elucidate this pressing concern.

In British Columbia, as is the case in Alberta, Saskatchewan, and in the United States, Provincial, State, and Federal governments failed to address the critical question of “should fracking be allowed” well after the fact of its evolutionary undertakings. What have been the cumulative costs to the ecology and to societies, and will the future costs be? ⁴

Examine, for instance, the discussions about fracking taking place in the European Union Parliament since late 2010. These, at least, are taking place, for the most part, while exploratory fracking is occurring in some European member states while under considerable public rejection, ⁵ debates resulting from what has transpired here in North America.

I encourage those interested in land use governance policy in British Columbia, as it relates to water and land use decisions in general, to take a strong stand on this issue. As I, and others, have stated, ***it appears that fracking is impossible to safely regulate.*** (For instance, in Quebec the regulator found 19 of the 31 new shale wells, some of which were not even fracked yet, were found to be leaking. The companies were ordered to fix the leaks, they tried, and failed.) ⁶

Sincerely,
Will Koop,
Coordinator

⁴ See, for instance, Chapter 14, (*Wellbore*) *Integrity on Trial: The Liability Nightmare*, from our January 2012 report, *Frack EU: Unconventional Intrigue in Poland*. <http://www.bctwa.org/FrkPol-16-Chap14.pdf>

⁵ See, *Community Joint Statement Calling for Fracking Moratorium*, November 27, 2012, Climate Justice Taranaki, <http://www.scoop.co.nz/stories/PO1211/S00394/community-joint-statement-calling-for-fracking-moratorium.htm>

⁶ Montreal Gazette, January 18, 2011, *Inspector found leaks at shale wells, government report says*, <http://blogs.montrealgazette.com/2011/01/18/inspectors-found-leaks-at-shale-wells-government-report-says/>
CBC News, January 5, 2011, *Leaks found in shale gas wells: Que. Report, 31 were inspected 'and more than half have have problems', says environmental expert*, <http://www.cbc.ca/news/business/story/2011/01/05/shale-quebec-bape.html>