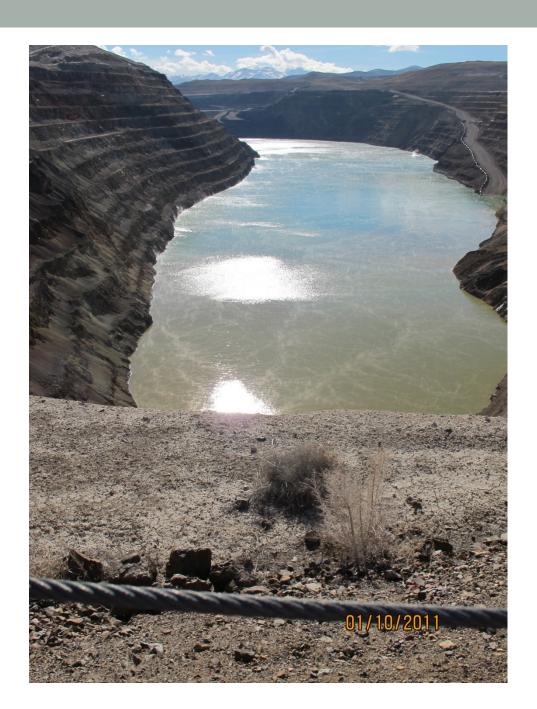
Hearing Exhibit #017-031 Submitted by Oil Sands Environmental Coalition (OSEC) Date: November 6, 2012

# END PIT LAKES: UNRESOLVED ISSUES

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# The Hazards of Modeling

- Numerical models need to have a correct conceptual basis
- Numerical models are of very little value if they have not been tested in actual situations
- Uncertainties can be magnified with multiple and sequential models
- At least in Nevada, a mine will not be permitted if a pit lake model indicates poor quality water.
   Modeling results have been adjusted to meet "good water quality" requirements
- Don't believe them- they can be useful, but an unverified model is often merely a mathematical exercise



# Lone Tree Pit Lake, Nevada



Relief Canyon Heap: Water is draining laterally and vertically. Note salt precipitate

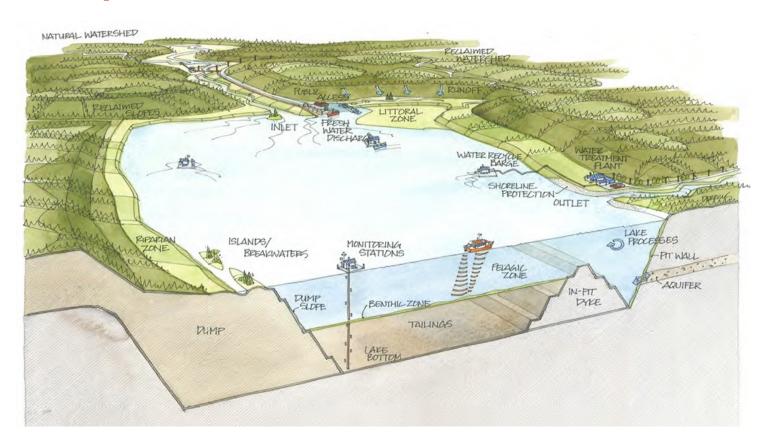
Jerritt Canyon Tailings Pond



## **End Pit Lake Definition**

CEMA defines an oil sands EPL as: "an engineered water body, located *below grade* in an oil sands postmining pit. It may contain oil sands by-product material and will receive *surface and groundwater* from surrounding reclaimed and undisturbed landscapes. EPLs will be permanent features in the final reclaimed landscape, discharging water to the downstream environment" (emphasis added) (Westcott and Watson, 2007).

# Conceptual End Pit Lake



Source: McKenna and Hrynyshyn: EPL Guidance Document, 2012

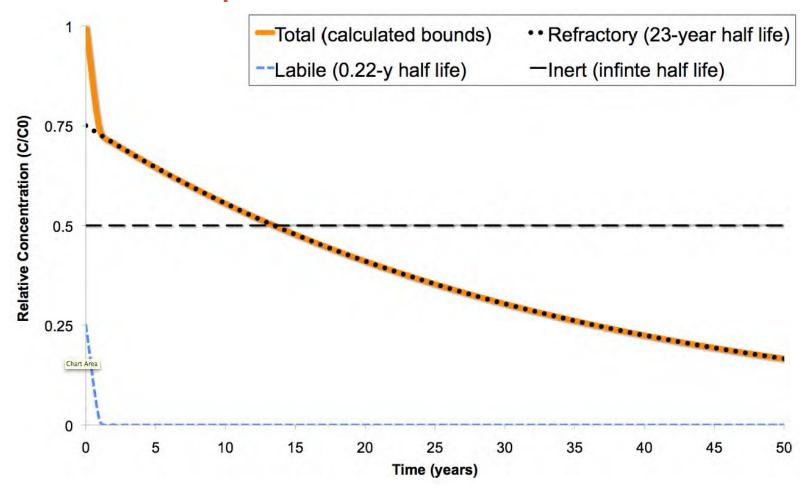
#### Contaminants in End Pit Lakes

- Salts: can be diluted, but not treated in an EPL, except by very expensive membrane techniques. Dilution with fresh water decreases the concentration, but not the total load into receiving waters
- Naphthenic acids: Continual release over decades and beyond- can be treated, but the cost is very high. Natural degradation is unlikely to be successful
- PAH: Highly variable and low solubility, but several are toxic and phototoxic
- Other contaminants: aluminum, cadmium, iron, mercury, strontium expected to exceed water quality criteria. Difficult to model
- Radioactive substances?

## Naphthenic Acids

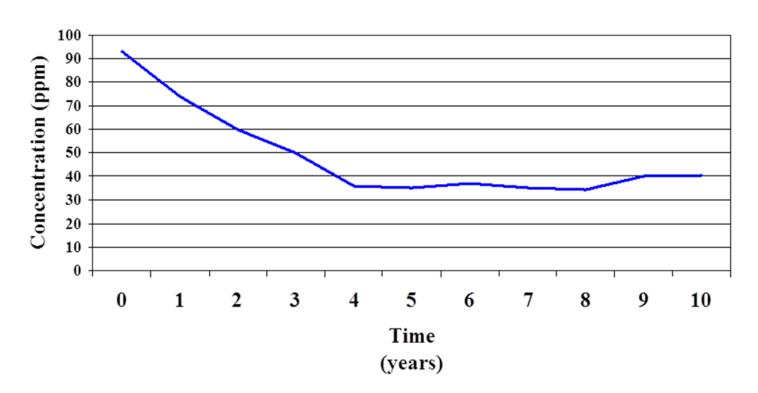
- Highly complicated array of aliphatic and aromatic carboxylic acids
- Grouping of these compounds as a single analyte ignores specific toxicity differences
- Grouping of these compounds as a single analyte ignores fate and transport differences
- How can a regulation be placed on these compounds when so much data is lacking?

# Figure 9–4: Modeled degradation of a single source of naphthenic acids.



McKenna and Vandenberg, EPL Guidance Document, 2012

#### Naphthenic Acid Degradation



Source: Zubot, Syncrude Presentation on Base Mine EPL

# Uncertainties in Modelling

- Release of contaminants to the EPL is highly variable
  - Dependent on infiltration of water into the tailings and release to the EPL
  - Highly heterogeneous hydraulic conductivities are expected- prediction of seepage is as much guess as quantifiable amounts
  - The time frame for leaching the contaminants from the tailings is on the order of many decades to centuries
  - Concentrations of soluble contaminants may exceed concentrations determined in the process water

### Uncertainties, cont.

- Lake dynamics are variable seasonal stratification may increase discharge of higher concentrations of tailings affected water
- Production of methane and hydrogen sulfide from settled tailings is highly uncertain.
   Sulfide may prevent sensitive species from colonization of the lake
- Data on the presence or absence of radioactive substances (common in many hydocarbon deposits) were not available

### Uncertainties, cont.

- Salts are not biological degraded- the salt release to the receiving waters is a cumulative problem from all of the mines in the region
- Modeling metals is highly complicated, and imprecise.
- Naphthenic acids are known to be toxic and a proportion (25-75%) very stable
  - While naphthenic acids have been studied for several years, the components that contribute toxicity are not well known.
  - Quantitation of naphthenic acids is apparently on a total amount, and does not reflect toxicity

### Conclusions

- Creation of EPL's is a grand experiment that is highly uncertain and problematic, based on the information available- modeling is not sufficient
- Alternative management of drainage water from the sites should be investigated, although few water treatment options exist that are economically available
- Although zero-discharge management is promised if water quality is unacceptable for discharge, treatment/management options of the volume of water that will generated are not clearly identified, and may not exist.