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**Laboratory**  
 Peterborough

 Professional Engineers  
 Ontario



November 27, 2025

537090 Main Street, Horning's Mills  
 Township of Melancthon, Ontario, L0N 1S6

Attn: Angelo Carnevale

**Re: Response to Review Comments, Hydrogeology Consultant Services Inc. & NVCA, 537090 Main Street, Horning's Mills**  
**Cambium Reference: 17217-001**

---

Dear Angelo Carnevale,

Hydrogeology Consultant Services Inc (HCS) has the provided review comments on behalf of the Corporation of the Township of Melancthon, dated March 3, 2025, regarding Cambium's Hydrogeological Assessment report prepared for your proposed subdivision development located at 537090 Main Street, Horning's Mills, Township of Melancthon, Ontario (Figure 1; Figure 2; Site). Additionally, Nottawasaga Valley Conservation Authority (NVCA) has provided review comments on behalf of the Province of Ontario under authority of O.Reg. 41/24, dated May 28, 2025. The objective of this letter is to provide a summary and Cambium's responses to the HCS and NVCA comments.

It should be noted that the proposed site plan has been revised and now includes only 21 proposed dwellings, instead of the previous plan which included 26 lots. This would further reduce the nitrate loading at the property boundary as well as reduce the demand on the water supply aquifer.

The conclusions of Cambium's Hydrogeological Assessment remain the same; that the proposed development is feasible from a hydrogeological standpoint and impacts to adjacent water resources and well users are not anticipated as a result of the development.

**HCS PEER REVIEW COMMENTS AND RESPONSES**

The following comments were provided in the HCS letter report. Cambium's follow up response to each comment in the HCS report was included below.



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*HCS comment #1:*

*“Performance of a door to door well survey of properties within a 500 m radius of the Site (reasonably measured from the perimeter of the Site) to identify and refine locations and construction details for nearby water supplies; and specifically, to provide a more detailed assessment of the potential for shallow water supplies to the north of the Site.”*

Cambium will complete a well survey to inventory the water supply wells within a 500 m radius of the Site. Cambium will provide a letter addendum to the Hydrogeological Assessment presenting the results of the survey.

*HCS comment #2:*

*“Assessment of the potential reason(s) for the significant difference in well performance and well capacity of TW103-24, and the potential impacts of multiple water supply wells servicing the proposed lots having similar performance and well capacity.”*

Test well’s logs and Lidar elevation data were used to compile the test well construction details in Table 1 attached. As provided in Table 1, test well TW103-24 was drilled to a more shallow depth at 20.0 mbgs compared to TW101-24 and TW102-24 at 24.4 and 29.9 mbgs, respectively. All the wells were advanced into limestone bedrock however. While TW103-24 has encountered only one water bearing fracture at a shallower depth of 15.8 mbgs (451.9 masl), the other two test wells encountered water bearing fractures at deeper depths. In test well TW101-24, water bearing fractures were identified at 19.8 mbgs (457.7 masl) and 21.6 mbgs (455.8 masl). While in test well TW101-24, water bearing fractures were identified at 19.8 mbgs (457.7 masl) and 21.6 mbgs (455.8 masl). Considering TW101-24 and TW102-24 have two deeper fractures contributing to water supply, it is inferred that this is the reason for the lower yield at TW103-24. TW103-24 was still able to perform at minimum pumping rate of 15 L/min which is within the >13.7 L/min threshold of Procedure D-5-5. If other future wells drilled



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for the proposed lots have a similar performance to TW103-24, they will still adhere to the capacity requirement of Procedure D-5-5.

The static water level prior to the May 9, 2024 pumping test in TW103-24 was 8.64 mbtop. The pump was installed at a depth of approximately 20 mbtop. The available drawdown in the well was therefore approximately 10.4 m (height of static water level above the pump). The water level at the end of the 6 hours of continuous pumping was 16.72 mbgs meaning that the well still had about 3.3 m of available drawdown. In Cambium's professional opinion, the residential wells will not be pumped for 6 hours continuously in typical daily usage and that there would be sufficient available drawdown for other wells that have similar performance as TW103-24.

*HCS comment #3:*

*"Discussion of the potential for mutual interference between wells located at distances of 30 m or less from each other throughout the proposed subdivision, and particularly where some of those wells may have similar performance and well capacity to TW103-24."*

Cambium assumes that the 30 m distance HCS referred to is based the proposed lot areas and the likely separation between any two contiguous wells. The closest wells TW101-24 and TW102-24 were 180 m apart and no mutual interference was noted between them based on the pumping test results as discussed in Section 4.1.4 of the hydrogeological assessment report. Based on the available drawdowns, intermittent pumping of the wells and the depth of the wells that will be installed in future, it is very unlikely to have a mutual interference between the wells that will be installed within 30 m distance.

Also, per the Section 4.2 of MECP Procedure D-5-5, three test wells were required per 15 ha and that the wells should be spatially distributed. Accordingly, the test wells were distributed spatially across the Site satisfying the above requirement.



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As noted in the response to comment 2, test well TW103-24 had about 3.3 m remaining of available drawdown at the end of the pumping test and the average household water use is not typically for a duration of 6 continuous hours and will vary throughout the day not stressing the aquifer in the same way as the pumping test. Furthermore, recovery events will occur between usage events mitigating the drawdown events. Therefore, mutual interference between the wells that have similar performance as TW103-24 would be deemed to be negligible.

*HCS comment #4:*

*“Confirmation regarding the potential future need to multi-well pumping tests to assess the potential for mutual interference, and to assess cumulative drawdown impacts of multiple wells operating simultaneously throughout the proposed subdivision.”*

This is not a requirement of Procedure D-5-5. The drawdown measurements within the available observation wells were completed at an appropriate frequency throughout the pumping tests as per the requirement in Procedure D-5-5 and no interference was noted during entire period of pumping. As such, Cambium is not recommending additional multi-well pumping tests at this time.

*HCS comment #5:*

*“Confirmation regarding the potential future need to include off-site water supply wells in any future pumping tests conducted in support of the proposed subdivision.”*

Future pumping tests are not recommended by Cambium at this time as mutual interference was not observed during the on-site testing program. However, Cambium will conduct a well survey within 500 m of the Site to catalogue the baseline conditions of the nearby residential wells.

*HCS comment #6:*

*“Confirmation regarding the potential for the application of more conservative variables (e.g. lower soil infiltration rate per MECP, higher daily sewage flow*



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*volume for each lot per OBC) to the Procedure D-5-4 calculations, and the resulting potential need for advanced sewage treatment to meet the ODWQS criteria limit.”*

The daily sewage flow volume of 1,000 L/day used in the calculations, is the daily average sewage effluent flow volume outlined in Procedures D-5-4 which was followed in the preparing the calculations. The higher sewage flow volume HCS referred to of 2,000 L/day in the Ontario Building Code (OBC) is the peak daily sewage effluent flow volume for which septic systems need to be designed for. For the sub-division developments, the average sewage flow is more representative of the typical daily flow for the subdivision lots. However, the septic systems will be required to be designed based on the maximum daily sewage flows referenced in Part 8 of the Ontario Building Code.

Regarding the variable infiltration rates, the HCS peer review mentions that the infiltration factor used initially appear reasonable. Per HCSs comment, using lower infiltration rates would result in a higher boundary nitrate concentrations forcing the use of advanced sewage treatment systems for the proposed subdivision. However, the soil infiltration rates used in the current nitrate impact assessment is reasonable for the soil type encountered at the Site, which is a fine to medium sand with some gravel component contributing to the greater infiltration rates.

*HCS comment #7:*

*“Confirmation regarding the proposed stormwater management (STM) facility(ies) and roadside ditches to infiltrate water they receive; and, of the potential need to revise the daily/annual dilution volume used in Procedure D-5-4 calculations in the event of the SWM Facility(ies) and/or roadside ditches cannot infiltrate water they receive.”*

Cambium has confirmed with Pearson Engineering that the roadside ditches will be open bottom ditches thus contributing to infiltration as Pearson has not been



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instructed to provide lined ditches. As such, there would be no changes to the provided water balance.

*HCS comment #8:*

*“Confirmation regarding the potential need to provide lot-level Procedure D-5-4 nitrate impact assessment calculations to contemplate the significant portions of the property that are not included in the lot areas.”*

The nitrate boundary concentration for a subdivision following Procedure D-5-4 of 10 mg/L is required at the site boundary, not at each lot boundary. This is typically done for lot severances, not subdivisions. Typically the development area (including parks or SWM blocks) are included as part of the property as they are included as features required for the proposed development and would not be subject to future development (i.e. additional severances or subdivision). Considering that the subdivided lots consist of the development area, the use of these lands is warranted for the development area and therefore nitrate dilution area.





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**NVCA PEER REVIEW COMMENTS RESPONSE**

The following comments were provided in the HCS letter report. Cambium's follow up response to each comment in the HCS report was included below.

*NCVA comment #2:*

*"The review of the water wells within 500m of the proposed development site is satisfactory."*

Noted. No further action is required.

*NCVA comment #3:*

*"The water level measurements in the three monitoring wells were completed on June 6, 2023, August 8, 2023, and May 8, 2024. The May 8, 2024, reading captures the seasonally high-water table elevation. Recognizing the depth of the water table elevation during the three sampling periods, no additional manual water level monitoring is requested for the purpose of this review."*

Noted. No further action is required.

*NCVA comment #4:*

*"As the approval of septic systems are the responsibility of the municipality, the review of the D-5-4 calculations related to the nitrate loading will be deferred to the municipality, e.g., Dufferin County."*

HCS has provided peer review comments on behalf of the Corporation of the Township of Melancthon which have been addressed in this response letter.



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November 27, 2025

**CLOSING**

We trust that the information in this submission meets your current requirements. If you have any questions regarding the contents of this report, please contact the undersigned.

Respectfully submitted,

**Cambium Inc.**

DocuSigned by:

6C8CA15FD6B4444...

Warren Young, P.Eng.,  
Coordinator – Hydrogeologist

DS

DocuSigned by:

677F3F2E4427404...

Kevin Warner, M.Sc., P.Geo (ltd), BCIN  
Technical Lead – Hydrogeology



2025-11-27

WY/KW

- Encl.    *Cambium Qualifications & Limitations*  
           *Figure 1 Site Location Plan*  
           *Figure 2 Site Plan*  
           *Table 1 Test Well Construction Details*  
           *Updated Development Plan*

P:\17200 to 17299\17217-001 Carneavale - GEO & HYD - 537080 Main St, Horning's Mills\Deliverables\LETTER - HYD response to comments\2025-11-27 LTR - Horning's Mill's - Response to Comments.docx







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Facts, conditions, information and circumstances may vary with time and locations, and Cambium's work is based on a review of such matters as they existed at the particular time and location indicated in its reports. No assurance is made by Cambium that the facts, conditions, information, circumstances or any underlying assumptions made by Cambium in connection with the work performed will not change after the work is completed and a report is submitted. If any such changes occur or additional information is obtained, Cambium should be advised and requested to consider if the changes or additional information affect its findings or results.

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### Site Assessments

A site assessment is created using data and information collected during the investigation of a site and based on conditions encountered at the time and particular locations at which fieldwork is conducted. The information, sample results and data collected represent the conditions only at the specific times at which and at those specific locations from which the information, samples and data were obtained and the information, sample results and data may vary at other locations and times. To the extent that Cambium's work or report considers any locations or times other than those from which information, sample results and data was specifically received, the work or report is based on a reasonable extrapolation from such information, sample results and data but the actual conditions encountered may vary from those extrapolations.

Only conditions at the site and locations chosen for study by the client are evaluated; no adjacent or other properties are evaluated unless specifically requested by the client. Any physical or other aspects of the site chosen for study by the client, or any other matter not specifically addressed in a report prepared by Cambium, are beyond the scope of the work performed by Cambium and such matters have not been investigated or addressed.

### Reliance

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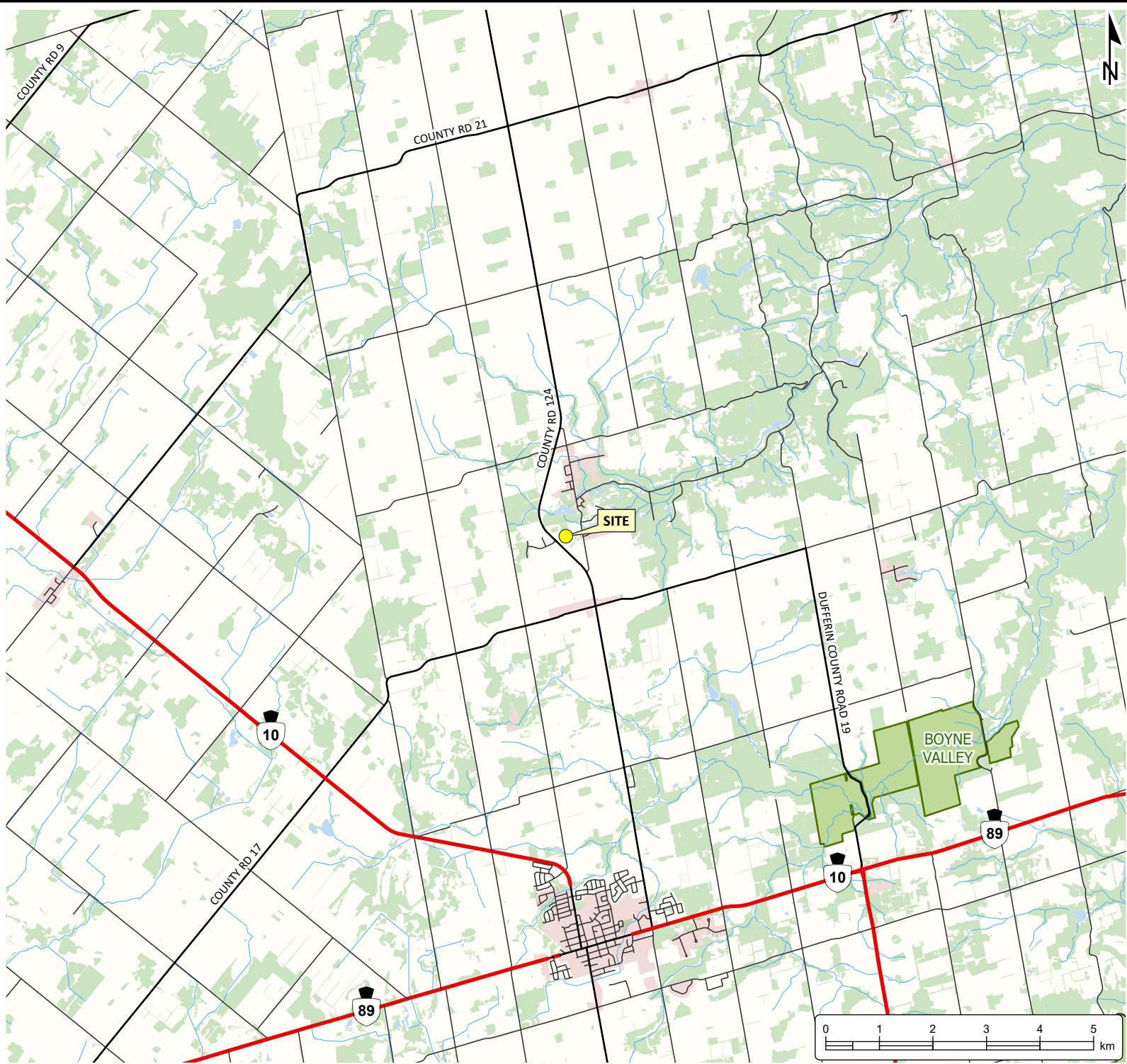
### Limitation of Liability

Potential liability to the client arising out of the report is limited to the amount of Cambium's professional liability insurance coverage. Cambium shall only be liable for direct damages to the extent caused by Cambium's negligence and/or breach of contract. Cambium shall not be liable for consequential damages.

### Personal Liability

The client expressly agrees that Cambium employees shall have no personal liability to the client with respect to a claim, whether in contract, tort and/or other cause of action in law. Furthermore, the client agrees that it will bring no proceedings nor take any action in any court of law against Cambium employees in their personal capacity.





**PRELIMINARY  
HYDROGEOLOGICAL  
ASSESSMENT**  
ANGELO CARNEVALE  
537086 Main Street Horning's  
Mills, Ontario

**LEGEND**

- Highway
- Major Road
- Minor Road
- Railway
- Watercourse
- Water Area
- First Nations Reserve
- Provincial Park
- Wooded Area
- Built Up Area

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**SITE LOCATION PLAN**

Project No.: 17217-001	Date: January 2024
Scale: 1:100,000	Rev.: NAD 1983 UTM Zone 17N
Created by: DBB	Checked by: SK
Figure: <b>1</b>	



**PRELIMINARY  
HYDROGEOLOGICAL  
ASSESSMENT**  
ANGELO CARNEVALE  
537086 Main Street Horning's  
Mills, Ontario

**LEGEND**

-  Borehole
-  Monitoring Well
-  Inferred Top of Bank (Cambium, May 2023)
-  Site (approximate)

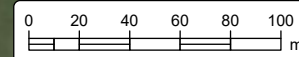
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**BOREHOLE LOCATION PLAN**

Project No.: 17217-001	Date: January 2024
Scale: 1:3,000	Rev.: SK
Created by: DBB	Checked by: SK
Projection: NAD 1983 UTM Zone 17N	Figure: <b>2</b>





**Table 1: Test Well Construction Details**

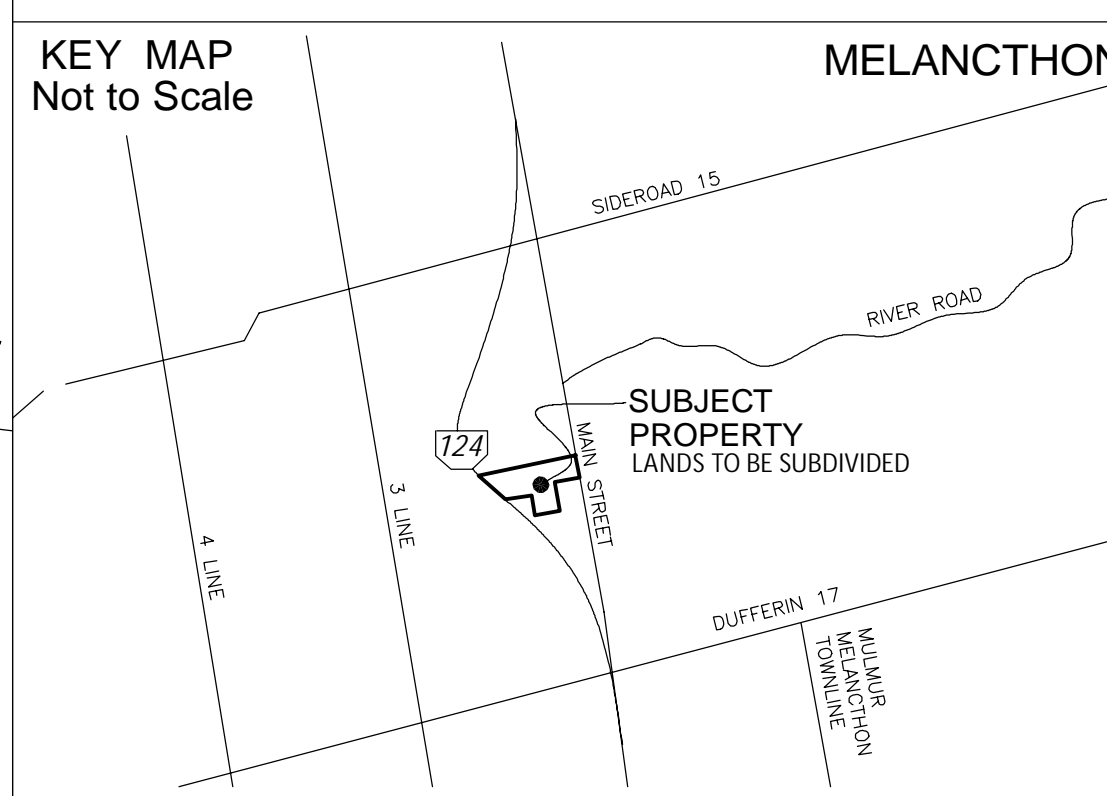
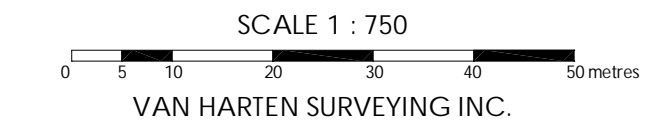
Test Well	Ground Surface Elevation <sup>(1)</sup>	Well Depth		Fracture Depth 1		Fracture Depth 2		Overburden / Bedrock Contact Depth		Open Hole Start		Open Hole End		Recommended Pumping Rate
	(masl)	(mbgs) <sup>(2)</sup>	(masl)	(mbgs) <sup>(2)</sup>	(masl)	(mbgs) <sup>(2)</sup>	(masl)	(mbgs) <sup>(2)</sup>	(masl)	(mbgs) <sup>(2)</sup>	(masl)	(mbgs) <sup>(2)</sup>	(masl)	
<b>TW101-24</b>	477.47	24.4	453.1	19.8	457.7	21.6	455.8	17.4	460.1	18.3	459.2	24.4	453.1	37.9
<b>TW102-24</b>	477.55	29.9	447.7	19.8	457.7	27.1	450.4	14.0	463.5	15.8	461.7	29.9	447.7	37.9
<b>Tw103-24</b>	467.72	20.0	447.8	15.8	451.9	N/A	N/A	8.8	458.9	10.8	456.9	20.0	447.8	11.4

(1) - Ground surface elevation derived from available lidar dataset

(2) - MECP well records used to determine depths

**DRAFT PLAN OF SUBDIVISION  
DPS --/--  
<NAME>**

**PART OF LOT 13  
CONCESSION 2  
OLD SURVEY  
TOWNSHIP OF MELANCTHON  
COUNTY OF DUFFERIN**



**SCHEDULE:** RE: SECTION 51- THE PLANNING ACT.

(a) AS SHOWN  
(b) AS SHOWN  
(c) SINGLE DETACHED RESIDENTIAL  
(d) AS SHOWN  
(e) AS SHOWN  
(f) AS SHOWN  
(g) DRAINED WELL (PROPOSED)  
(h) SAND AND LOAM  
(i) AS SHOWN  
(j) NO MUNICIPAL SERVICES AVAILABLE  
(k) SUBJECT TO EASEMENT AS IN INSTRUMENT NO. MEL18578

**LAND USE SCHEDULE**

LAND USE	LOTS / BLOCKS	AREA (ha)	Area (ac)	UNITS
SINGLE DETACHED RESIDENTIAL	LOTS 1 - 21	8.18	20.21	21
STORM WATER MANAGEMENT POND	BLOCK 1	0.56	1.39	
0.3 RESERVE	BLOCKS 2-4	0.01	0.02	
STREET A		1.03	2.55	
STREE B		0.40	0.99	
<b>TOTAL</b>		<b>10.18</b>	<b>25.16</b>	

**PROPERTY DESCRIPTION**  
ALL OF PIN 34139-0101  
PART OF LOT 13  
CONCESSION 2  
OLD SURVEY  
TOWNSHIP OF MELANCTHON  
COUNTY OF DUFFERIN  
SUBJECT TO EASEMENT AS IN INSTRUMENT NO. MEL18578

**SURVEYOR'S CERTIFICATE**  
I HEREBY CERTIFY THAT THE BOUNDARIES OF THE LANDS TO BE SUBDIVIDED AS SHOWN ON THIS PLAN AND THEIR RELATIONSHIP TO ADJACENT LANDS ARE ACCURATELY AND CORRECTLY SHOWN.

DATE: \_\_\_\_\_  
LUKE G. WILCOX, O.L.S.

**OWNER'S CERTIFICATE**  
I AUTHORIZE VAN HARTEN SURVEYING INC. TO PREPARE AND SUBMIT THIS DRAFT PLAN OF SUBDIVISION TO THE TOWN OF MELANCTHON.

OWNER: ANGELO CARNEVALE JR.

DATE: \_\_\_\_\_  
ANGELO CARNEVALE JR.  
I HAVE THE AUTHORITY TO BIND THE CORPORATION

NO	REVISION	DATE
5	CHANGED LOTS AND FLOODPLAIN	OCT 17, 2025
4	ADDED FLOODPLAIN OFFSET LIMIT	JULY 23, 2024
3	ADDED TREE PROTECTION NOTES	MAY 6, 2024
2	ADDED ADDITIONAL LOTS	SEP 22, 2023
1	1ST SUBMISSION TO CLIENT	AUG 10, 2023



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Guelph Ph: 519-821-2743  
Orangeville Ph: 519-940-4110  
www.vanharten.com info@vanharten.com

DATE: OCT 22, 2025 4:21:59 PM  
DRAWN BY: L.G.W. CHECKED BY: L.G.W. PROJECT NO: 33199-23-0P  
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