From: Cornell Wynnobel

Date: February 13, 2024 at 7:20:12 PM MST

To: aep.minister@gov.ab.ca

**Subject: THREAT TO WATER SUPPLY** 

Rebecca Schultz, Alberta's Minister of Environment and Protected Areas;

I am writing in relation to the article in the Cochrane Eagle dated January 11, 2024 in which you state your concern for the extreme shortage of water. I would like to bring your attention to the incongruency of your concern with what is really happening on the ground.

ARE YOU FAMILIAR WITH BIG HILL SPRINGS PROVINCIAL PARK? If you have never been there I would urge you to view the images in this link to the park's

site. <a href="https://www.google.com/search?client=safari&sca\_esv=de3b8b35270c999b&rls=en&q=Big+Hill+S">https://www.google.com/search?client=safari&sca\_esv=de3b8b35270c999b&rls=en&q=Big+Hill+S</a> prings+Provincial+Park&tbm=isch&source=Inms&sa=X&ved=2ahUKEwiOm-

<u>G\_oqmEAxW\_FjQIHX7UBhsQ0pQJegQICxAB&biw=1409&bih=695&dpr=2</u>. It will give some sense of the jewel that this park is, as a source of pure water, and a peaceful refuge for people wishing to experience nature in close proximity to their homes.

Quoting from Vivian Paris of the Big Hill Springs Preservation Society: "This spring has been ranked federally as the fourth most important thermal spring in Canada." Paris adds that "the Big Hill Creek is a 'really pristine tributary' into the Bow River which is Calgary's water supply. The Big Hill Springs Provincial Park receives 250,0000 visitors annually and was recently renovated at a cost of \$1.2 million dollars by the provincial government." HOW CAN THE ALBERTA GOVERNMENT ALLOW THE RISK OF CONTAMINATION OF BIG HILL SPRINGS, SUCH A VALUABLE RESOURSE? This water is the reason the park was designated a provincial park. IT IS UNDER THREAT BY THE CLOSE PROXIMITY OF GRAVEL PITS WHICH KEEP BEING APPROVED BY ALBERTA ENVIRONMENT. They remove the substrate (ground) which filters the water, and also remove the wetlands.

Other negative effects are the dust generated which is silica dust (a known carcinogen), the noise of the heavy industrial equipment (see the attached photo of the type of equipment) and the extreme disturbance to the wildlife that have used this corridor for decades. Given the strong prevailing north and west winds in our part of the province, the dust will certainly blow into the park and into our community.

SINCE WETLANDS CONTRIBUTE TO WATER RETENTION AND THE PRESERVATION OF BIODIVERSITY, HOW CAN GRAVEL PITS BE ALLOWED TO ELIMINATE THEM? Much research has determined that replacing natural wetlands with man-made ones is not effective. Although Alberta Environment policy states the goal is to maintain wetland areas in Alberta, it allowed Mountain Ash to eliminate 13 wetlands to mine for gravel. This, in a time when, as you state, we are threatened with drought and might have to use stringent measures to conserve water. There were appeals against this decision, but the Department allowed the company to go ahead before the resolution of these appeals. They have been scraping the land.

<u>I am including a map showing the approved and potential gravel pits next to the park.</u> The Mountain Ash pit is just 800 meters from the headwaters of the park. It intends to remove the substrate (ground)

to within 1 meter of the aquifer. This water table varies according to the weather, the amount of precipitation and temperatures, etc. In time of climate change, this water table will be affected. This means the possibility of an error in calculating the water table. It also can cause an increase in the temperature of the creek water which directly affects the viability and reproduction of the fish and decreases biodiversity.

The same aquifer supplies the well for our community of 52 people, Big Hill Creek Estates, (noted on map) with our drinking water and household water. Another arm of Alberta Environment demands our community test our water daily for chlorine, e-coli and pathogens and more intensive expensive testing at a regular prescribed schedule. We are required to have a Certified Water person to monitor our water in order to comply with the regulations. It costs each household \$2,200 per year for our water, that is  $15 \times 2,200 = 33,000$ .) If it is important enough for the Department to require us to monitor so closely, how could another arm of the Department put our drinking water at risk?

It is my understanding that Hillstone Gravel has not been adhering to its obligation to report on a regular basis. If this is allowed for one company it seems reasonable that the additional companies will receive the same lack of enforcement. Why would the stringent rules of residents be different from the ones of big companies affecting the same water?

Once the water is contaminated it is too late and once the wetlands are eliminated it is also too late.

EACH GRAVEL PIT APPLICATION IS ALLOWED ON ITS OWN WITHOUT CONSIDERATION OF THE CUMULATIVE EFFECTS OF THE 5 TO 6 PITS IN THE IMMEDIATE AREA. PLEASE REFER TO THE VISUAL MAP.

I encourage you to read the attached Statement of Concern we sent in January 30, 2022 and, time allowing, the submission we made to Rocky View County February 21, 2021.

ALSO, WE STRONGLY URGE YOU TO INTERVENE AND PRESERVE THIS PRECIOUS WATER SOURCE BEFORE IT IS TOO LATE. AS I SAID, MOUNTAIN ASH HAS ALREADY BEGUN REMOVING THE SOIL.

WHAT REWARD IS WORTH CONTAMINATING THE WATER SOURCE WHICH IS IN SHORT SUPPLY AND THE AIR QUALITY AND REPLACING THE SOUNDS OF NATURE WITH HEAVY INDUSTRIAL EQUIPMENT AND GRAVEL TRUCKS AS WELL AS ENDANGERING THE LIVES OF WILDLIFE IN THIS IDENTIFIED WILDLIFE CORRIDOR.

Thank you for your consideration in this desperately important matter.

WATER IS LIFE!!!

Muriel Wynnobel

Ps

List of some of the professional scientists who have stated their opposition to this location for the Mountain Ash gravel pit at the county level:

Dr. Jon Fennell an experienced hydrogeologist and Geochemist, specializing in water security and climate resiliency, who provided a 75 page report explaining his rationale including his extensive credentials. Mountain Ash Limited Partnership Summit Gravel Pit Review of Hydrology, geochemistry, fish and aquatics, and climate change, January 2021

Dan Brown, Hydrogeologist B.Sc. Geology M.Sc. Geology and Hydrology

David Reid, Professor of Biology, University of Calgary

Lori Skulski, Manager of Hydrogeology Group

Ryan Carnegie, Professional Geologist

Kenneth J. Stevenson, PhD. Professor emeritus of Biochemistry, University of Calgary

Tako Koning, Registered Professional Geologist

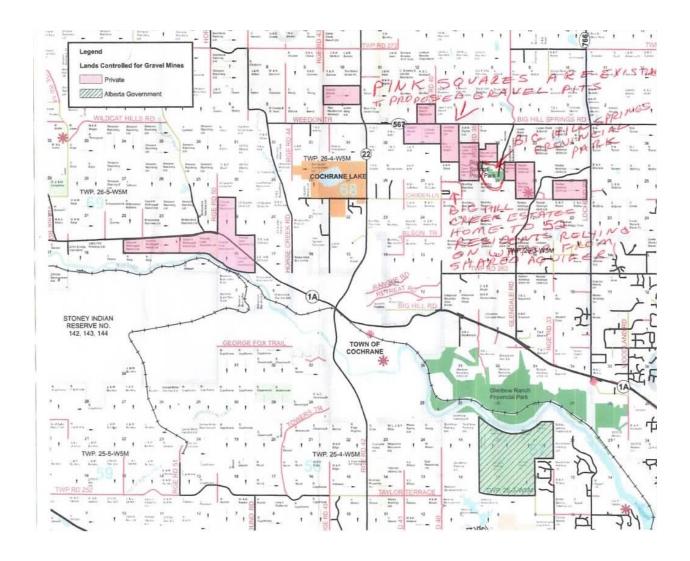
**Trout Unlimited** 

Cows and Fish

Alberta Environment and Parks

Alberta Wilderness Association

Canadian Parks and Wilderness Society Southern Alberta



# RVC gravel advisory committee members still far apart on many issues

#### RILEY STOVILA

Rocky View Guunty's (NVC) Aggregate Resource Plan (ARP) Stakeholder Advisory Committee convened for their monthly meeting hat seek with the hopes of defining some consensor recommensistions that could be delivered in council by early March.

However, when it came to the agenda item that locused in himman health and aggregate, the committee struggled to reach any sort of common ground at all.

Made up of six members that represent residential, agricultural, and aggregate industrial interests, as well as a chair, the committee is staffed with an arrangement of opinions that would seem to make building a compensa difficult.

Dale Sociaeri and Monty McNair, the committee's aggregate industrial inembers who represent the interests of gravel companies, differed from their colleagues during a lot of the debate around the gravel issue.

We have to find a balance between gravel extraction and the needs and wants of residents, see have to work tagether and coexist," and McNair, who also claimed that there was a feeling of a lack of treet between residents and the gravel corporations.

"It appears to me there is a mistrust that these jurisdictions are not doing the jub...I don't know side we don't have faith," cutting of McNair.

why we don't have faith," continued McNair.
McNair also said that he respected the rosses that
SVC resident have with gravel extraction and all
the side effects that come with it, but also noted

Soutant and McNair seemed to be of the opinion that since gravel extraction is a recessity, and therefore inevitable, it could be done and just out of the way so that the land could be mad for different things that might before serve continuation.

"Let's get in and remove the non-renewable resource before flual land soe," said McSan: "Don't we have a responsibility to the whole community had a shall?"

Sections admitted that a cause of the stranged torsions between gravel companies and county systems is a fack of communication.

"We can do a better job at reducing the impact on the local community...) think we can do that," he

Committee member John Whatherfil, who ceptisents residential interests, brought up that the committee had to be looking at what was best practice and to not just immediately assume gravel extrac-



Racky View County's ARP Stakeholder Advisory Committee is being asked to submit recommendations on future gravel production in the County by later this spring.

THE PHOTO SANAT MAST MEDIA

tion was a given.

"it's irresponsible to develop aggregate that's not required, in areas where it's going to be most harmful to residents," said Weatherill.

in meeting notes from the December advisory committee meeting chair Buthara McNeel senior that county administration pointed out that a successful ABP represents the various interests of the county and that a "thoughthaly planned development [would] reduce conflict and look after health

Weatherill senndered whether the nove of gravel

extraction could be initigated by not developing grave) juts in areas that could puse high potential health risks, therefore sidestepping the problem entisely.

Section Limped to say that he had been Not by My Back Vard (NIMBY) sectioned attened to selut

Weather if suggested many times before.

"If we don't produce the gravel within RVC or within time proximity, ultimately that aggregate resource will be transported through the county and the same impacts will exist," and Sostaert.

INC GRANTS

CONTINUED ON PAGE 8

Cochrane Eagle 2024-02-11, 5:45 P



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Volume 23 Number 12

www.cochraneeagle.ca

Thursday, October 26, 2023



#### Wastewater leak Page 2

Cochrane declares State of Local Emergency



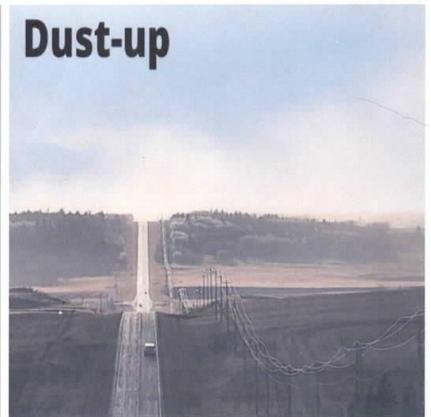
#### Training exercise Page 8

Military division pays a special visit to the Cochrane RancheHouse



### Classical concert Page 18

Cochranites are invited to partake in an evening of music for a good cause



This recent photo showing the dust cloud raised from just one pit on Highway \$62 west of Big Hill Springs Provincial Park has become a rallying point for opponents of allowing more gravel mining in the area. Two landowners pointed to it during their presentations to a tribunal earlier this month as evidence of dust policition. Dr. Judy Stewart also used if to close her presentation on the legal aspects of gravel extraction at the University of Calgary on Oct.14. New story on page A6.

PARTY COLUMNS WHICH LABOR PROBERTION SOLICES



From: Cornell Wynnobel

Subject: DAPP0001717 & EMS No. 001-00481044. Mountain Ash Limited Partnership

Date: January 30, 2022 at 10:43 PM
To: aep.waapplications@gov.ab.ca
Cc: aep.minister@gov.ab.ca



## Statement of Concern

I am writing this statement of concern as our residence is directly affected by the proposal to remove 13 wetlands located in the W 1/2 of 31-026-03-W5 for the purpose of aggregate extraction. Our legal land description is S 30 - 26 - W5 - 5. We are located approximately 1.6 km from the proposed site and our water well is a communal well located directly south of the excavation site in question at about 1.6 km away from said site.

Following are excerpts taken directly from the Water Act:

-"Recognizes household water use as a statutory right."

-"The goal of the new policy is to maintain wetland areas in Alberta such that the ecological, social, and economic benefits that wetlands provide are maintained, thereby helping to ensure that Albertans have healthy watersheds that provide safe and secure drinking water supplies and healthy aquatic ecosystems, and reliable, quality water supplies for a sustainable economy. In recognition of the high rates of wetland loss in some watersheds, this policy also encourages Albertans to be proactive in increasing wetland areas."

As the purpose of the wetland removal is to prepare for excavation of the substrate which removes the filtration system for the aquifer, it should not be treated in isolation from the excavation itself. The security of our potable water supply is at stake. Water is our lifeblood and should not be risked for the sake of gravel pits. Almost daily in the news, stories of communities with compromised water quality highlight the fact that careless development is responsible for destroying this essential, life giving resource.

Our goal in this statement of concern is to ensure the application is DENIED in order to conserve, preserve and protect the aquifer that supplies our drinking water and water for residential use. The proposed excavation is directly above the aquiter supplying our community well.

It is also very important to us that the Big Hill Springs Provincial Park waters are not contaminated. We consider ourselves, as residents of Alberta and lovers of the park, to be directly affected by anything that puts the springs, and therefore the park in danger of being ruined.

Both the quality and quantity of the water for our homes and the park are at risk of negative effects from the excavation.

The MALP application proposes to remove 13 existing wetlands.

Again the water act states that it is important to protect the wetlands to preserve the biodiversity and the watershed. It is important to protect them from irreparable damage.

MALP intends to excavate gravel down to within 1 metre of the groundwater. Water tables do fluctuate over time in response to patterns of weather and precipitation. We have only to reflect on the past few years to recognize how unpredictable the weather can be. Past studies have shown that exposing new soils, new gravels to increased oxygen, increased sun and increased precipitation can result in the mobilization of sediments and heavy metals down through the remaining 1 m of cover and into the groundwater. The removal of the natural cover of 20 to 30 m buffer will also likely result in an increase in water temperatures in the groundwater in summer months which would very negatively impact the trout populations further downstream in Big Hill Springs and Big Hill Creek.

The MALP application should be outright denied, and a moratorium placed on any new gravel pit applications until comprehensive multi-year studies are carried out by neutral third party researchers/consultants. These studies should conduct, with substance, a cumulative effects assessment. Big Hill Creek and Big Hill Springs watershed may in fact be incompatible with any new gravel pit operations, including the MALP application.

Of importance to consider is the cumulative effects of multiple excavation sites. There already exists The Hillstone Pit operating just

about 1 km from the MALP site. Several other gravel pit companies own adjoining properties with the intent of mining gravel there.

Economically speaking, as members of the Big Hill Creek Estates Water Coop, we pay \$2,000 per year per residence to cover the costs of operating our water well. These costs include maintenance of the well, electricity, etc. as well as the testing required by AEP. AEP is currently reviewing and drafting new regulations for water testing for high quality water wells. They recognize the importance of this commodity. Hopefully this other branch of the department will not allow our water to be put at risk by allowing a source of contamination to operate in such close proximity. Should our water quantity and quality be compromised our property values would be devastatingly reduced, perhaps making our homes unsaleable.

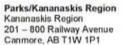
Gravel extraction will harm groundwater. While this harm may become discernible only through time, mitigation would be entirely ineffective and the damage would be irreparable.

In the Rocky View County hearing, the representative from Mountain Ash stated that sand and gravel do not serve as a filter for water. This is totally incorrect. The international organizations who supply filtration systems to countries without pure drinking water use sand/gravel filters to purify the well waters for the people. They are considered the most effective as they do not require expertise on the part of the people using the water. We have such a filtration system provided by nature over thousands of years. Let's not destroy it.

Once more, I request that this application not receive approval, to protect our residential water supply as well as the province's park which is considered of "provincial environmental significance" based on the presence of the natural spring that feeds the perennial creek.

Thank you for considering this heartfelt statement of concern.

Cornell	Ŏ,	Muriel	vvynnobe





February 17, 2021

Legislative Services Rocky View County 262075 Rocky View Point Rocky View County, AB T4A 0X2

Re: BYLAW C-8051-2020

Dear Rocky View County:

Alberta Environment and Parks has been made aware of a groundwater technical report related to the Mountain Ash Limited Partnership, Summit Gravel Pit proposal. This report, prepared by Dr. Jon Fennell, provides a review of hydrogeology, geochemistry, fish and aquatics and climate change related to the proposal. Our interest in this report is related to the potential effects of the proposal on Big Springs Provincial Park.

Alberta Environment and Parks (herein Parks) manages Big Hill Springs Provincial Park, which is located adjacent to a number of existing and potential aggregate extraction developments including the Mountain Ash proposal. Parks wants to highlight the importance of Big Hill Springs Provincial Park and its nationally significant year round springs, unique tufa deposits and vegetation communities. To ensure these values persist for future generations, Parks needs to secure the protection of these values.

Over the years, Parks has provided comments to developments including:

- 2013 Redesignation of South Rock lands.
- 2018 Draft Aggregate Resource Plan.
- 2019 Amendments to Hillstone Aggregates.
- 2020 Redesignation and MSDP for Mountain Ash.

Parks response to aggregate development applications has been consistent in requesting that proponents conduct a thorough assessment of surface and groundwater quality and quantity impacts related to the Park and the Big Hill spring. Parks reviewed the Biophysical Impact Assessment Report (SLR, January 2020) that supports the Mountain Ash proposal and notes that although the consultant links Big Hill Springs to the site's groundwater and notes increase in spring flows, the report does not assess impact of water chemistry changes in the spring as a potential impact of the development.

In Dr. Jon Fennel's report, geochemistry results indicating increases in metals due to the removal of overburden (exposing subsurface material) are concerning. As the Big Hill springs are so closely linked to the groundwater at the Mountain Ash site, we question the proposal's potential impact in groundwater quality and spring chemistry, affects on tufa formation, and its effects on fish and fish habitat.

In light of the new information presented in Dr. Jon Fennel's report, we request that Rocky View County consider additional assessment for the Mountain Ash site and delay its decision on the planning application PL20200031 and the associated Mountain Ash Summit Pit Master Site Development Plan (PL20200034) until the assessment is complete. The assessment should consider project effects and cumulative effects. The assessment should also use criteria ratings such as duration, frequency, reversibility, magnitude, probability supported by quantitative data and comparisons with provincial and federal water quality guidelines. To reiterate, the assessment needs to link groundwater between the site and the springs not only for quantity but also for quality (chemical changes).

We also request that Rocky View County considers the recommendations outlined in Dr. Jon Fennel's report as a means of mitigating project and cumulative impacts including:

· Aggregate Development Setbacks

- Specifically 1.6 km setback from the boundary of Big Hill Springs Provincial Park.
- Additional 800 m setback whereby development does not occur within 4 m of the water table.

We are confident that Rocky View County will manage aggregate resources so that values that inspired the establishment of Big Hill Springs Provincial Park will remain intact. If you require further clarification or information regarding the comments outlined above, please contact me at 403-678-9545.

Sincerely,

Michael Roycroft

Aldand Part

Regional Director, Kananaskis Region

CC.

Andrew Schoepf, Kananaskis East Area Manager Maria Lynn, Senior Park Planner, Kananaskis Region Thea Mitchell, Park Planner, Kananaskis Region

Classification: Protected A

From: Cornell Wynnobel

Subject: Bylaw C-8051-2020 PL202000031 (06731002/4)
Date: February 17, 2021 at 2:26 PM



We, Cornell and Muriel Wynnobel, 19 Big Hill Creek Estates, Rocky View County, vehemently oppose the above-noted bylaw to redesignate this property from Agricultural to allow for aggregate extraction. We oppose it on two fronts, the damage it will do to both our residential community and to the Big Hill Creek Provincial Park.

Although several of the issues are pertinent to both our residential area and the provincial park we will address them separately beginning with the park.

Of utmost importance is the probability of damage to the source of the spring water which is the reason the park was designated a provincial park in the first place. The aquifer which supplies the park's springs lies directly below the proposed sites for gravel extraction. Over centuries the land which protects the aquifer has developed to filter contaminants and maintain the water temperature which keeps the springs clean, flowing and at a fairly constant temperature. The removal of this protective layer of soil and gravel will destroy the filtration system and thus damage or indeed totally ruin the springs, the life blood of the park. The Paskapoo formation which is the same source as the Bearspaw pit provides the water to our area. According to a peer review document submitted by Ailsa Le May, P.Geo on January 19, 2021, the science which the aggregate company submitted, the hydrogeological study put forth with it's proposal was unworthy of credit and reliance. RVC needs to commission a peer review of the hydrogeological study before even considering this application.

This park is a sanctuary for a multitude of types of wildlife, from fish and birds to small and large mammals. It is a source of food, shelter and water for these creatures. It is one of the rare spawning grounds for the endangered Bull Trout. Remove the constant source of water or contaminate it and the park will be rendered useless. The springs feed the Big Hill Creek which ultimately runs into the Bow River.

The county has expressed its opinion that recreation is of significant importance for the residents as evidenced by asking for feedback on what is needed and desired for recreational purposes. Walking trails have shown to be of ultimate importance. This park supplies unique and exquisite walking trails with the benefit of nature, a canopy of shade, fresh water and waterfalls and historic significance.

Covid 19 should have taught us the value of natural spaces to the physical and mental health of people. Why would we ruin an existing source of this type of recreation for more gravel which exists in a multitude of places in Rocky View? How would it enhance a person's physical and mental health to walk the trails to the sounds of heavy industrial equipment and toxic silica dust rather than fresh air and the calming sounds of nature?

The access to the park is from Highway 567. How dangerous will it be trying to enter the highway with a multitude of gravel trucks speeding along the highway. I would be surprised if any one of the residents or councillors has not experiencesd problems with gravel trucks: speed, lack of courtesy, spreading gravel onto the roads and sending gravel into windshields. The tarps required by law are not adequate to prevent the gravel from escaping and are often nothing but shredded rags covering mere fractions of the load in many cases. The proposing company states about 30 - 50 trucks a day for one pit. What about the cumulative effects of 4 to 6 pits. That equals at least 200 to 300 gravel trucks. How many trips does each gravel truck make a day? Highway 567 is a two-lane highway with no significant shoulders, large, steep hills and hidden intersections, a disaster waiting to happen.

Now, on to the residential community in which we live. The objectionable qualities of this proposal are physical and mental health risks posed by dust, noise, reduced property values, probability of water contamination and just plain worry about contamination or even the loss of water supply or value of property.

Silica dust is known to be carcinogenic and travels well beyond the gravel extraction sites. The most dangerous PM2.5 (2.5 micron) particles can travel over 14 km in a 20 km/hr wind and PM10 (10 micron) particles can travel 3.7 km in the same 20 km/hr. wind. Since the winds are most frequently from the north or the west and very often well above the 20 km/hr. range, both our residential area immediately south of the proposed gravel pit and the park immediately east of the pit would be subjected to this dangerous, toxic dust on a regular basis. As the Town of Cochrane develops further north, even the residents of Sunset Ridge would be exposed to the silica dust. An Alberta Occupational Health and Safety Bulletin states "exposure to crystalline silica can cause a number of health problems including silicosis, lung cancer, chronic obstructive pulmonary disease and emphysema, as well as pulmonary tuberculosis." If you live anywhere in Rocky View, you will have witnessed top soil, snow and even roofing flying through the air on numerous occasions. This risk of illness should be considered of extreme importance in approving the application.

The noise level of the existing aggregate extraction site is already evident in our community and it is considerably farther away than the proposed site. The operation of heavy equipment and constant movement of gravel trucks will be a constant source of annoyance and stress for all residents. This has proven to be harmful to both and physical and mental health. Given the location of the sites the sound will travel up to our area. It is even possible to hear concerts in Mitford Park from up here so how much more noise is generated by the gravel extraction process. Because we are significantly above the proposed extraction site no berm will reduce the noise level for our community nor will it block the view into the heavy industrial area, or moonscaped landscape which is presently a scenic and bucolic setting. It will remain an eyesore till long after the present residents have left or died.

The effects on our water supply is of huge concern. As mentioned above, gravel mines would remove the protective filter of the aquifer allowing contaminants to seep into the aquifer. With so much heavy industry and industrial equipment right above our aquifer, there is certainly a reasonable chance of affecting our well. Our only source of water is the common well the residents of Big Hill Creek Estates share. Any contamination or depletion of volume would leave us without the vital source of clean, potable water. This is the most valuable commodity of all to humans and animals.

Our property values will be very negatively affected. We, the residents, and prospective buyers purchase acreages to enjoy the peace and tranquility of rural life including the scenes from our windows and wildlife passing through. With heavy industry looming within our sight lines and the noise and dust, who would be motivated to buy in this location?

The cumulative effect of the proposed wells including the already functioning well needs to be taken into consideration in all aspects mentioned above: water contamination, dust, noise, traffic, etc. Each well individually has an impact, but taken together they pose a huge risk to the ability to enjoy our homes and lives.

The company claims to have taken residents' concerns into consideration, but we have not seen, nor heard a word from them.

The traffic Impact assessment submitted with the proposal did not take into account the steep



We believe that approval of this proposal would be a failure of the Council to carry out it's responsibility to Rocky View voters and residents. A full Area Structure Plan needs to be completed before any proposals of this nature are even considered. Such a plan must take into its analysis data, reports and scrutiny from independent experts not supported by applicants with vested interests. To not utilize independent sources would be negligent on council's part.

The pros and cons: Many significant cons have been listed above. The pros seem to be few and only benefit B & A Planning Group as there are already plenty of other gravel sources.

Do you as a council wish your legacy to be the destruction of a natural jewel, the Big Hill Springs Park and the waters it contains or the death or injury of a schoolbus load of children. When a gravel truck collides with a school bus, it will be death.

Please take these concerns carefully into consideration when you make a decision on the proposed gravel extraction operations.

Respectfully,

Cornell and Muriel Wynnobel