

Martin Haefele
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
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YELLOWKNIFE NT X1A 2N7

Dear Mr. Haefele

Ur Energy Inc. Screech Lake Project (EA0607-003) GNWT Information Requests – Round One

Thank you for the opportunity to submit Information Requests concerning Ur Energy Incorporated proposed Screech Lake Project. Please find attached the requests as submitted by the Government of the Northwest Territories.

Should you have any questions regarding the above, please feel free to contact Mr. Joel Holder at 920-6106.

Sincerely

Joel Holder

Environmental Analyst

Policy, Legislation and Communications Environment and Natural Resources



MVEIRB Information Request

IR Number: Number is assigned by MVEIRB

Source: GNWT

To: Ur Energy

Issue: Project description

Preamble

The developer's land use permit application and the "Environmental Screening Study for Ur Energy Inc. Permit Application to Conduct Uranium Exploration Drilling at Screech Lake, Northwest Territories" contain different information on the length of the proposed exploration program.

Request

Please identify whether the potential length of the proposed exploration program (maximum of 20 drill holes) is two or five years. In addition, please provide the months of the year(s) that exploration activities will take place and what these activities will be.

IR Number: Number is assigned by MVEIRB

Source: GNWT

To: Ur Energy

Issue: Best practices

Preamble

"Noise, lights and dust generated by drilling activities may cause temporary displacement and stress on individuals of wildlife species that utilize habitats within and adjacent to the target areas. The geographic extent of the disturbance will depend on the location of the drill pads as well as the physical presence of machinery and workers. The use of mufflers and best work practices should partially mitigate these effects." (Direct quote from page 63 of the Environmental Screening Report)

Request

Please identify the best work practices that will be used to mitigate these impacts.

IR Number: Number is assigned by MVEIRB

Source: GNWT

To: Ur Energy

Issue: Best practices

Preamble

"While potential migration routes exist within the target area mitigation measures throughout the drilling Program will be taken to reduce the interaction and disturbance of any migratory animals, local birds, and vegetation within the target area." (Direct quote from page 63 of the Environmental Screening Report)

Request

Please identify the best work practices and measures that will be used to mitigate impacts to migratory animals, local birds and vegetation.

IR Number: Number is assigned by MVEIRB

Source: GNWT

To: Ur Energy

Issue: Caribou impacts and mitigative measures

Preamble

The proponent identifies in the Screening Report (p. 25) that the project area is located in the spring migratory path for barren ground caribou (namely the Beverly and Ahiak herds) and proposes that drilling activity occur during April and May, which overlaps with the spring migration. Caribou cows during this time period are in their last trimester of pregnancy and are often in poor physical condition. Therefore, direct disturbances that require additional energy expenditure or interfere with feeding can have significant negative impacts on caribou health during this time period. The permit application and screening report fail to adequately describe impacts and mitigative measures to barren ground caribou associated with the project:

Request #1.

Please identify the following:

- Number, timing, type or frequency of fixed wing and rotary wing flights required for:
 - Camp set up, support and removal, and
 - Moving crews during the exploration work (to/from and within the study area).
- Whether an airstrip is required for fixed wing aircraft.
- Direct and indirect impacts of camp set up, support and removal, and exploration activities on caribou.
- Mitigative actions that will be taken to avoid or reduce potential impacts while caribou are migrating through the study area.

 Mitigative actions that will be taken to avoid or reduce the impacts on caribou in the study area during winter months or any other times of the year when explorations activities may occur.

Issue: Assessment of impacts to barren ground caribou and species listed under the federal Species at Risk Act (SARA) and by the Committee for the Status of Endangered Wildlife in Canada (COSEWIC).

Preamble

The authors conclude that "residual impacts to wildlife and wildlife habitat are anticipated to be minor in magnitude" (p. 64) and that both overall impacts on wildlife and cumulative impacts "are anticipated to have a negligible environmental consequence" (p. 64, 70), with no supporting analysis or results. This is despite the acknowledgement that "temporary displacement and stress on individuals" will likely result from noise, lights and dust generated by drilling activities, and that disturbance to wildlife resulting from their activities will be frequent (p. 63).

Request #2.

What information or analysis was used to determine that the project would have a negligible impact on SARA and COSEWIC listed species (i.e. grizzly bear, wolverine, peregrine falcon, short-eared owl) and barren ground caribou?

Issue: Cumulative effects on barren ground caribou and species listed under the federal Species at Risk Act (SARA) and by the Committee for the Status of Endangered Wildlife in Canada (COSEWIC).

Preamble

The MVLWB approved a land use permit for Uravan's Boomerang Lake operation for May 2006 – May 2008, and Ur-Energy has requested a permit for Jan/07 to Dec/11. Therefore there is potential for the Uravan and Ur-Energy drilling programs to be run concurrently in winter-spring 2007/08, or perhaps additional years if Uravan receives additional permits or extensions. Consequently, exploration activities may occur concurrently on both sides of the Thelon River that has been identified as an identified spring migration route for barren ground caribou and has important water crossings.

Request #3.

Please provide the information sources and analysis that was used to determine that the cumulative impact on migrating barren ground caribou and SARA/COSEWIC listed species (i.e. grizzly bear, wolverine, peregrine falcon, short-eared owl) is negligible.

IR Number: Number is assigned by MVEIRB

Source: GNWT

To: Ur Energy

Issue: Waste management and attraction of carnivores

Preamble: UR Energy states in its application that combustible wastes will be incinerated daily. Improper food and waste storage, handling and

incinerated daily. Improper food and waste storage, handling and disposal can lead to the attraction and subsequent habituation of bears and other carnivores (e.g. wolverines) ultimately leading to the need for removal or destruction of animals. Further, the storage of wastes in a manner that attracts wildlife is a violation of the

Wildlife Act.

Request: Please provide a detailed waste management plan that addresses how the attraction of carnivores to the site will be controlled. This

could include:

Layout of camp infrastructure

Segregation and storage of wastes

· Proper cleaning of recyclables

Details on the incinerator to be used

Electric fencing

Disposal of incinerator residue