



Mackenzie Valley Environmental Impact Review Board

Box 938 , 5102-50th Avenue, Yellowknife, NT X1A 2N7

www.mveirb.nt.ca

From: Alistair MacDonald Fax: (867) 766-7074

Environmental Assessment Phone: (867) 766-7052
Officer

Date: November 6, 2007 Pages: 30 including this page

To: Distribution List for EAs Fax:
0708-002 through 0708-005

CC:

**Subject: Consolidated list of comments from interested parties and developers
on how to structure EAs 0708-002 through 0708-005**


To whom it may concern,

Please see the attached consolidated list of comments from all developers and interested parties, responding to the Review Board's Call for Comments on how to structure these EAs, issued on October 3, 2007.

The Review Board received comments from 12 organizations and individuals. The Review Board will be considering these comments while developing draft Work Plans for each of these EAs.

Do not hesitate to contact me with any questions.

Regards,



Alistair MacDonald
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
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Alistair MacDonald

From: Alex Hall [alex@canoeartctic.com]
Sent: October 19, 2007 3:21 PM
To: Alistair MacDonald
Subject: Re: EAs 0708-002 through 005: Call for Comments on Conduct of Environmental Assessments in the Upper Thelon River Basin

Dear Alistair:

I don't see the point of having any hearings at all for these four companies that want to drill for uranium in the upper Thelon River basin. The decision has been made with the UR-Energy hearings. What would be different from what we all went through in the UR-Energy hearings? Also, it would be ridiculous and even cruel to put Lutsel K'e through these kinds of hearings repeatedly.

Alex Hall, Canoe Arctic, Inc.

Alistair MacDonald wrote:

- > Apologies for any cross postings.
- >
- > Please see attached MVEIRB document requesting your input on how to
- > conduct the above-mentioned four environmental assessments.
- >
- > Deadline for comments is November 2, 2007.
- >
- > Contact me with any questions.
- >
- > Regards,
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- > Alistair MacDonald
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Alex Hall
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PO Box 130
Fort Smith, NT X0E 0P0
867.872.2308



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October 22, 2007

Mr. Alistair MacDonald
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board

By Fax (867) 766 7074

Environmental Assessments of Four Grassroots Exploration Projects
Uravan EA 0708-2, Uravan EA 0708 03, Bayswater EA 0708 03, Bayswater EA 0708 05

Dear Mr. MacDonald:

The Chamber of Mines was asked to comment on the conduct of environmental assessment of four grassroots exploration projects in the Thelon area.

The Chamber believes that the referral to environmental assessment of such low-impact projects of such short duration is unwarranted and trivializes the environmental assessment process. Each project should be the subject of a screening review that focuses on the impact, if any, on the environment of the immediate site for the period of the project. The impacts, if any, could be mitigated by permitting conditions as would normally be contained in a land use permit issued by the Land and Water Board. It is unreasonable to subject projects of this type to full environmental assessment. Not only is this wasteful of public resources but it has the very real possibility of making the northern mineral industry unsustainable.

Grassroots exploration is how mines are found. Without exploration, the mining industry will decline as existing reserves are exhausted. To subject projects such as these to environmental assessment has already caused some junior companies to re evaluate their participation in projects in the NWT. The review of more grassroots projects will no doubt see even more companies withdraw their exploration budgets from the territory.

The mining industry currently is responsible for half the NWT's gross domestic product and over 3000 direct jobs and it is currently mining or planning to mine discoveries made in the early 1990s. It takes about 10 years to license a new mine and our oldest diamond mine is likely half-way through its mine life. We will see a decline in the mining industry's ability to continue to produce these economic benefits and with it if we do not develop more effective environmental assessment and permitting tools.

We believe that the very wording of the Mackenzie Valley Resource Management Act is misleading. Each project is referred to as a "development". These are not developments but

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rather temporary land uses that, in themselves, will leave almost no lasting impact on the land. On a worldwide basis, about 10,000 mineral showings are examined to eventually result in a mine. Long odds indeed. Grassroots exploration is the activity that "sorts" these showings to a reasonable few that would then be subject to more intense scrutiny. Without relatively unfettered access to land for low-impact, short duration initial exploration, history shows us that exploration companies leave the jurisdiction. We believe that this is happening now. In spite of a worldwide resource boom, exploration expenditures are down in the NWT, one of only two jurisdictions in Canada where this is the case.

Because the Chamber of Mines disagrees with the basic underpinning of your proposal, we cannot comment on its technical aspects. Our contention that these projects are beneath the scope of environmental assessment would seem to be borne out by that fact that your proposal would group common elements of each project and possibly include evidence from the UR Energy Environmental Assessment. While we acknowledge your attempt to make the process more efficient, we contend that it would only be more efficient at doing unnecessary work. We appreciate your effort, we just do not think that your proposal represents an effective long-term solution.

We would urge your Board to join the Chamber in calling on the Minister of Indian Affairs and Northern Development to undertake a major review of the MVRMA with a view to clarifying some problematic areas of the Act. This would enable the Minister to issue direction to the Board to make its processes more efficient and more effective.

Yours truly,



Trevor Teed
Vice President (NWT)

- c Hon. Robert McLeod, Minister, Industry Trade and Investment, Government of the Northwest Territories
- Pierre Gratton, Vice President, Mining Association of Canada
- Tony Andrews, Executive Director, Prospectors and Developers Association of Canada
- Trish Merrithew-Mercredi, Regional Director General, DIAND, Yellowknife
- Doug Paget, A/Director, Mineral Resources, DIAND, Ottawa



Akaitcho Interim Measures Agreement Implementation Office
NWT Treaty #8 Tribal Corporation

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Stephen Ellis – Akaitcho IMA Implementation Coordinator
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October 24, 2007

Alistair MacDonald – Environmental Assessment Officer
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 Fax: (867)-766-7074

RE: Comments on the conduct of environmental assessments in the upper Thelon Basin (EA0708-02, EA0708-03, EA0708-04, EA0708-05)

Mr. MacDonald:

In a letter to the MVLWB dated July 27, 2007, I articulated the Akaitcho Dene First Nation (AKFN) position regarding uranium exploration in the upper Thelon Basin. The position is that applications cannot be considered until the following take place:

- INAC acts upon the MVEIRB UR-Energy decision;
- The Crown fulfills its obligation to consult with the AKFNs regarding rights-based assertions in the upper Thelon Basin.

Positive action on the implementation of these matters will hopefully set a context for uranium exploration in the upper Thelon Basin, and is the only way any certainty or clarity will be injected into the regulatory framework in the region. Reviewing new applications in the absence of any direction from INAC is inefficient, wasteful of the public purse, and discouraging to the objectives of both industry and First Nations.

Fortunately, there seems to be some progress on this front. In his recent letter accepting the MVEIRB decision on UR-Energy, the Minister of INAC committed to developing a draft plan regarding the "long term context for land and resource management in the Thelon watershed". The development and implementation of this plan, in association with the AKFNs, will hopefully provide guidance on how applications for development in the region will be considered. Proceeding with application reviews in advance of the implementation of this plan will be confusing and likely prejudicial.

In the July 27 letter, I requested that further applications in the upper Thelon be put into abeyance until the MVEIRB UR-Energy decision was acted upon. This request is even more relevant given INAC's commitment to develop a broad management plan for the region. However, this does not seem to be possible due to the limitations of the MVRMA with regards to landscape considerations and s.35 Crown obligations. Consequently, we are in the somewhat absurd position of proceeding with four separate EAs that are virtually identical to UR-Energy in context, scope, and potential impact.

These EAs will undoubtedly result in the same issues and concerns being raised by the First Nations, aboriginal organizations, tourism industry, and the general public. It is an unnecessary burden to expect concerned parties to fully engage in these EAs when they will be simply repeating the messages articulated during UR-Energy. Therefore, the NWT Treaty #8 Tribal Corporation has the following comments pertaining to the conduct of the Uravan and Bayswater EAs.

Evidence Transfer from the Public Record for UR-Energy

All relevant evidence from the UR-Energy public registry should be transferred to the public registry of each of the four EAs. From the perspective of the AKFNs, there is little or no difference between the UR-Energy, Uravan, and Bayswater proposals.

Scoping

The scope of assessment should be generic among all four EAs, though some location-specific issues may be identified. It could be assumed that the preliminary screening results for these EAs and the results of the scoping exercise during UR-Energy are together adequate for the purpose of scoping these proposed projects.

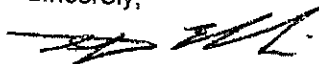
Gathering New Evidence

If all the relevant evidence from UR-Energy is transferred to each of these EAs, there should be little need for the gathering of new evidence. Evidence related to new site-specific issues, if there are any, should be elicited with Information Requests in order to save time and money for all.

Public Hearings

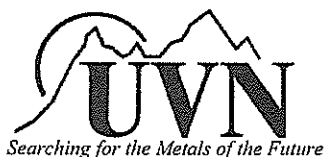
Assuming that the issues arising in these EAs will be very similar / identical to UR-Energy, there should not be any need for a public hearing. Again, most concerned parties have said what they have to say during UR-Energy, and they should not be required to repeat themselves. That being said, it is perhaps wise to wait until the gathering of new evidence is completed to determine whether a public hearing is necessary to deal with potential new issues that were not addressed during UR-Energy.

Sincerely,



Stephen Ellis – Akaitcho IMA Implementation Coordinator
NWT Treaty #8 Tribal Corporation

- c. Chief Adeline Jonasson – LKDFN
- A/Chief Louis Balsillie – DKFN
- Chief Fred Sangris – YKDFN (Ndilo)
- Chief Eddy Sangris – YKDFN (Uettah)
- Florence Catholique – A/Wildlife, Lands and Environment Manager, LKDFN
- Rosie Bjornson – IMA Coordinator, DKFN
- Trish Merrithew-Mercredi – Regional Director General, INAC
- James Lawrance – Director, INAC
- Gabrielle Mackenzie-Scott – Chair, MVEIRB



October 30, 2007

Mackenzie Valley Environmental Impact Review Board
5102 – 50th Avenue, PO Box 938
Yellowknife, NT X1A 2N7

Attention: Alistair MacDonald
Environmental Assessment Officer

RE: Call for Comments – EA 0708-02 and EA 0708-3 Upper Thelon River Basin

In connection with the Mackenzie Valley Environmental Impact Review Boards ("Review Board") letter dated October 3, 2007 titled "Call for Comments on Conduct of Environmental Assessment in the Upper Thelon River Basin" Uravan Minerals Inc. ("Uravan") would like to make the following comments and suggestions regarding Uravan's environmental assessment (EA), EA 0708-02 and EA 0708-03 (the "Uravan EAs"):

Grouping the EAs of Bayswater and Uravan

Although the Bayswater Uranium Corporation ("Bayswater") and Uravan exploration projects are similar, as noted by the Review Board's letter referenced above, plus the areas encompassed by these projects; i.e. landscape, water, flora, fauna and socio/cultural concerns are the same, Uravan is not in favour of linking the Bayswater and Uravan EAs and suggests they be assessed on their own merit as required by the provisions of the *Mackenzie Valley Resource Management Act* ("MVRMA"). Because Bayswater and Uravan are separate public corporate entities, the response and actions taken regarding these assessment proceedings by Uravan and Bayswater could be different, therefore, running the EAs together could create differences and difficulties down the road that are not perceived at this time. Uravan believes running these EAs separately shouldn't require significant repetition; only the reproduction of the scope, issues, documentation, inclusion of information from the public record, new information and Work Plan would be required.

Irrespective of the forgoing paragraph, the Uravan EAs are closely linked and should be run together. Also, given that Uravan is proceeding with the Uravan EAs, Uravan would suggest all of Uravan's mineral claims (area shown on the attached map) located along the southwest margin of the Thelon Basin and within the upper Thelon River watershed, be incorporated in the Uravan EAs. By doing so, additional EAs on subsequent LUP applications covering Uravan's mineral claims in this area should not be necessary.

Also, for the public record (the "Public Record"), Uravan does not agree that EAs are necessary or required on either Land Use Permit (LUP) application MV2006C0008 and MV2007C0038 and considers the EA referral by the Review Board 'over kill' and frivolous given the low impact nature of these projects. Uravan would point out that EA 0708-02 is related to a submission to 'amend' an existing LUP, MV2006C0008, which Uravan believes is typically an administrative function by the Mackenzie Valley Land and Water Board (MVLWB) and should not be subject to an EA. In Uravan's view, no consideration was given by the MVLWB and the Review Board that Uravan has conducted low impact field operations over the last two summer seasons (2006 and 2007) with this approved LUP (MV2006C0008) and no specific concerns have been brought forward by communities or land use inspectors. Now, given the same project and operational standards, Uravan's existing LUP is effectively not approved, as determined by the MVLWB and Review Board, and subject to an EA.

Further, it appears to Uravan that all applications for new or amended LUPs located in the upper Thelon River Basin or within the Akaitcho First Nations land claim area are now subject to EAs without consideration of the projects low impact and operational limitations. Uravan believes these decisions have become a 'default policy' by the Review Board based on the "*Report of Environmental Assessment*" (the "Review Board Report") with respect to the UR Energy LUP application and Public Hearing. The area encompassing the "Upper Thelon River Basin", which encompasses thousands of square kilometers (page 9, figure 1, Review Board Report), has become a mandatory 'trigger' for an EA by the MVLWB and Review Board. Uravan wonders, given this 'blanket' decision making policy, where in the Northwest Territories (NT) is an

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EA not required? Uravan believes the Review Board is now 'legislating' land use policy. Based on the Review Board's current non-discretionary EA referral policy and 'self-fulfilling' precedent set by the recommendations in the Review Board Report, Uravan believes that the Review Board has adopted a 'one-use' land-policy in the upper Thelon River Basin and AKFN land claim area irrespective of other competing land use rights and obligations as sanctioned by the *Canadian Mining Regulations*.

Evidence Transfer from UR Energy file

With respect to incorporating 'evidence' from the UR Energy EA and public record, Uravan believes that all information/evidence should be allowed to be transferred to the Uravan EAs as long as no interested party or regulatory body has veto power over what is 'relevant'. Uravan believes the cumulative information making up the UR Energy EA is valuable and would eliminate repetition. By "rolling in" all information and evidence from the UR Energy EA the interested parties, including Uravan, have the opportunity to clearly state what evidence is not relevant by submitting new supportive evidence. Given these parameters Uravan would support allowing the inclusion of all evidence from the UR Energy public registry with respect to EA0607-003 into the Uravan EAs.

Scoping

Uravan believes the scope of the Uravan EAs would best be determined by: (1) Uravan and the Review Board jointly issuing a series of "scoping questions" to all interested parties with a specific period to respond, (2) allowing the interested parties to define their concerns with respect to the proposed project and to identify what would mitigate these concerns and (3) the inclusion of the UR Energy file.

Uravan believes determining the 'scope' of the 'public concern' issues to be assessed is the most critical component and task to be completed in the Uravan EAs. The 'scope' should clearly define what the Uravan EAs are about and attempt to focus on and define the 'public concern' issues that have been previously alluded to in the responses to Uravan's proposed project (LUP Amended MV2006C0008 and New MV2007C0038)(the "Project"). Without some clear idea of what the 'public concern' issues are, the EA Work Plan, conclusions and potential subsequent public hearings could become unwieldy, encompassing a broader agenda than the participants envisioned and potentially allowing the introduction of hearsay-evidence into the Public Record, much like the UR Energy public hearing. Also, without clearly understanding and focusing on the issues, the mitigation of 'public concern' becomes illusive and potentially nonnegotiable, like the UR Energy LUP application. Isn't the goal for conducting an EA to provide clarity around the issues for all stakeholders and to establish ways to mitigate potential issues, concerns and land use conflicts, not legislating new land use policy?

Further, although the MVLWB and the Review Board have determined through the 'preliminary screening' process that Uravan's Projects ".....might have public concern" as stated by the MVLWB's *"Preliminary Screening Report"*, followed by the Review Board stating ".....that there is cause for potential public concern over the proposed project....", no specific 'public concern' or issues were identified prior to the EA referral or in the Notice of EA or in the Public Record. On the contrary, the MVLWB *Preliminary Screening Report* of Uravan's LUP applications confirmed that all the development components of Uravan's LUP applications, including regulatory input, provided operating standards that established that the development proposal would not have a significant adverse impact on the environment.

Based on Uravan's review of the community responses to its LUP applications no public concern issues were identified: (1) that haven't been addressed and mitigated through 'best management practices' identified in the LUP applications plus government regulatory comment or (2) that don't include issues in connection with Aboriginal Rights and land claims, which Uravan has no authority to resolve no matter how many EAs are held. Therefore, again in Uravan's view, the Review Board appears to have adopted a 'blanket' EA policy based on Aboriginal Rights and land claim issues given its own precedent set in the Review Board Report, as opposed to determining specific standards and guidelines or the consideration of competing land rights and obligations pursuant to the *Canadian Mining Regulations*.

Gathering new evidence

Contingent upon defining the 'scope' and 'issues' of the Uravan EAs, as discussed above, Uravan favours the "Information Requests" (IRs) approach as suggested by the Review Board, particularly option (a): "Using one or more rounds of IRs on the scoping of these developments to generate information about impacts and mitigation options". This approach, along

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with the evidence transfer from the UR Energy file, would eliminate the need for a Developer's Assessment Report, which Uravan believes is not required.

Public Hearings

Uravan believes holding public hearings are important as they provide a face-to-face venue where potentially the interested parties can gather to engage the issues, share information and mitigate 'public concern', such as fears around uranium exploration and development and potential adverse impacts of a development. Uravan would favour a public hearing with respect to the Uravan EAs, provided the 'scope', 'issues' and 'gathering of new evidence' procedures were well represented by the interested parties that presumably expressed 'public concern' and where the 'public concern' issues have been defined and/or determined through the 'scoping' or IRs process. Public hearings can be very powerful and valuable tool to address public concern regarding potential adverse impacts of a project and ultimately can provide opportunity to mitigate the issues. However, Uravan has no desire to be involved in a public hearing without some clear 'rules of procedure' established and followed by the Review Board, i.e. a meeting agenda that is clearly defined and adhered to. The public hearing agenda should encompass clear language, relevance and standards based on the input of all interested parties prior to the public hearing, not during or after.

Alternatively, Uravan would favour a 'hearing conference' concept whereby all the interested parties that have identified themselves to the Review Board would meet and try to resolve, through information sharing and negotiation, a reasonable resolution to the 'public concern' issues identified in the scoping process. Uravan believes this approach would create a more proactive ('win-win') method for resolving issues versus the current reactive, one sided and one-use ('win-lose') approach to solving potential land use conflict as currently adopted by the Review Board.

UR Energy Public Hearing

With respect to Uravan's review and analysis of the UR Energy public hearing (the "Public Hearing"), the Public Hearing transcripts and the conclusions and recommendations contained in the Review Board Report, it is obvious to Uravan the 'scope' and 'issues' of the UR Energy EA and Work Plan was not fully defined and those portions that were defined were not adhered to in the Public Hearing. Uravan believes UR Energy did not have complete knowledge of the information to be gathered with respect to its EA prior to walking into the Public Hearing. The real issue around Aboriginal Rights and land claims and the connection between 'spirit' and "the place where God began" as potential cumulative environment impacts were never identified in UR Energy's Terms of Reference in its Work Plan. According to the Review Board, as documented in UR Energy's Work Plan (3.2.2 Issues, page 3): "The review of the records indicates that caribou is the environmental component of greatest concern. Cumulative impacts on caribou (and associated harvesting and cultural impacts) are an important consideration in this assessment". As documented in the transcripts of the Public Hearing and the Review Boards Report this was not the case. Nowhere in UR Energy's Work Plan, which was drafted based on submissions from all interested parties, were "spiritual concerns" identified. Further more, the 'Scope of Assessment' in UR Energy's EA Work Plan was not the same as the 'Scope of the Environmental Assessment' as outlined in the Review Board Report, i.e. nowhere was Section 115 of the MVRMA ever referenced in UR Energy's Work Plan, however, this section was used extensively in the Review Boards assessment of the Public Hearing submissions. In UR Energy's pre-hearing meetings and submissions, 'cultural impacts' were only referenced in connection to the potential adverse impact of caribou migration, calving and harvesting not 'spiritual concerns'. Also of note, nowhere in UR Energy's EA Work Plan was the upper Thelon River Basin ever referenced as an area of 'spiritual concern' as it was in the Review Board Report. The boundary identified in UR Energy's Work Plan, beyond the footprint of the proposed project was stated as "Larger areas may have to be considered for impacts of caribou, species at risk, and wildlife harvesting", again, no reference to upper Thelon River Basin and its association with 'spiritual concerns' and what potential adverse impacts UR Energy's project may impose.

Had UR Energy been aware that the term 'cumulative environmental/cultural impact' went well beyond landscape, flora, fauna, air and water; and into the realm of 'spiritual concerns' it may have gathered different data and had a better chance to address these concerns at the Public Hearing and in its EA. Therefore, Uravan believes the Review Board erred and effectively biased and negated UR Energy's EA; given that the Review Board broke its own 'rules of procedure' by allowing the use of hearsay-evidence, unclear language, standards and non-relevant issue into the Public Hearing and Review Board Report that were previously not identified as 'public concern' issues. This lack of a clear Work Plan and Public Hearing procedure and the 'one-sided' post hearing evaluation of the evidence, effectively cast a veto against UR Energy's project. Uravan believes these events resulted in the Public Hearing being an administrative formality; ending in confusion,

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contradiction of prior regulatory policy and a conclusion/recommendation by the Review Board that, according to many, has exceeded their intended mandate, thereby "legislating" land use policy by effectively withdrawing large areas of Crown land from mineral exploration and development and establishing a precedent policy for issuing blanket EAs.

Closing Statement

In closing, Uravan would like to state that it is mindful of the current land claims and land withdrawal negotiations between the Government of Canada (the "Crown") and the Akaitcho First Nations people, groups and communities (the "AKFN") as it pertains to the Akaitcho Traditional Territory, the upper Thelon River Basin and the issues referenced above and how important these negotiations are to the AKFN. Uravan also recognizes that the AKFN Aboriginal Rights include the right to be consulted by the Crown when development may conflict with those rights. Uravan also recognizes that its exploration activities being conducted and proposed on its Boomerang property may affect the AKFNs traditional lands, their relationship with the land, water and resources, their social and cultural values, their way of life and the environment. However, Uravan also believes its exploration and potential development activities on these traditional lands, with the use of best management practices and the participation with the AKFN in sharing information, will not have a cumulative or adverse impact on the AKFNs traditional lands, their relationship with the land, water and resources, their social and cultural values, their way of life and the environment.

In recognition of these 'public concerns' and issues, Uravan believes it has taken positive steps to mitigate potential conflicts and cumulative impacts to the environment and traditional lifestyles and in doing so has strived to develop a respectful and working relationship with the AKFN to solve these issues. Uravan believes the best way to evaluate or determine the cumulative effects or impacts of environmental or socio-cultural-economic concerns are by direct participation/observation/monitoring of actual exploration/drilling operations. Uravan believes the joint participation with Uravan and Aboriginal environmental committees, teams or groups would be a more valuable activity to determining potential impacts versus conducting costly hypothetical studies or frivolous EAs given the low impact level of activity on the land. To this end, Uravan continues to encourage the AKFN to work directly with Uravan on monitoring its exploration activities as a means to mitigate concerns over the environment and socio-cultural issues and seek to develop economic benefits out side its land claim negotiations with the Crown. Uravan encourages the community leadership to make site visits to become more familiar with Uravan's operations and to allow Uravan to become more familiar with the community concerns as a means of mitigating environmental and socio-cultural concerns and to visualize potential economic benefits for the communities. It is Uravan's view that the AKFN are looking for balance, both economically and culturally and seek a higher level of participation in the decisions made by all the stakeholders in the Akaitcho region regarding their traditional land. Uravan believes its direct interaction with the aboriginal communities is a powerful alternative to mitigate 'public concern' issues, as opposed to the one sided excessively restrictive and frivolous regulatory policies being imposed by the Review Board that Uravan and the rest of the mineral exploration industry in the NT are now experiencing.

Respectfully Submitted
Uravan Mineral Inc.

Signed: Larry Lahusen

Larry Lahusen, Executive Chairman

Larry Lahusen

Executive Chairman

Uravan Minerals Inc.

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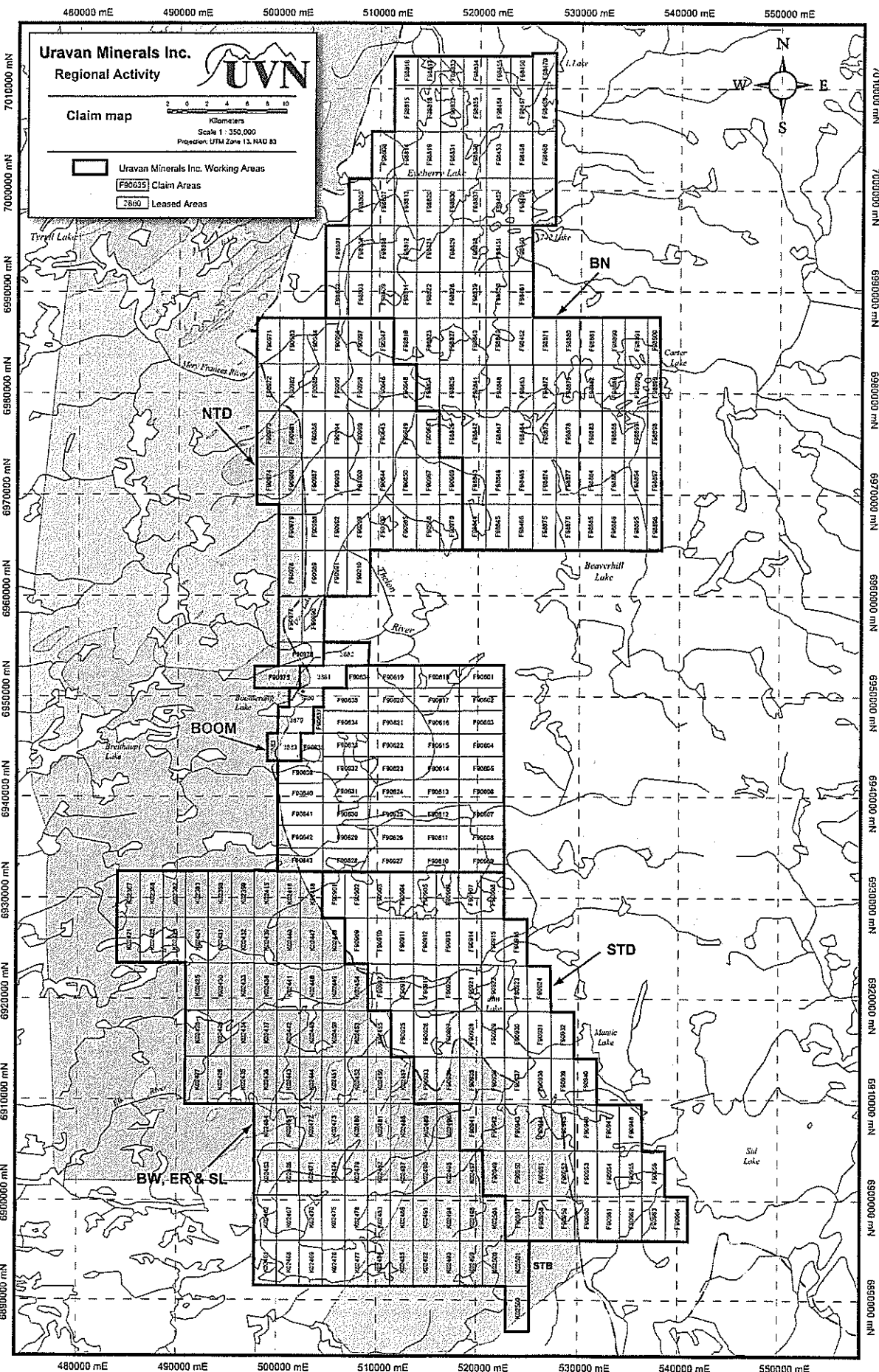
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October 30, 2007

Mr. Alistair MacDonald
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
5102 – 50 Avenue
YELLOWKNIFE, NT X1A 2N7

Dear Mr. MacDonald:

Comments on Conduct of Environmental Assessments in the Upper Thelon River Basin (EA0708-002 – EA0708-003 – EA0708-004 – EA0708-005)

After reviewing the document entitled, *Call for Comments on Conduct of Environmental Assessments in the Upper Thelon River Basin*, from your office the Northwest Territory Métis Nation comments are as followed.

The NWTMN wants to see the MVEIRB conduct environmental assessments according to law and established regulations. To say that there are similarities in the next four EAs is not enough to combine the process. No other EA has been combined and there is no need to combine these four as it so happens the applications were received close together.

There are no short cuts for environmental assessments.

1. Evidence Transfer from Public Record for UR Energy

- a) It should be up to the Board whether or not they think other files may help in the environmental assessment of any developer's application for water or land use in the NWT.

This question is redundant to the NWTMN as we would be making some case that has been given in evidence in other EAs. Even if the MVEIRB includes evidence, relevant or not, the Board in all likelihood will run into or receive the same or similar evidence from public hearings.

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October 30, 2007

- b) Again, it should be up to the Board whether or not they want to use (written or verbal) submissions that are on file from other similar EAs as its our feeling the Board is going to get new submissions on each request for development requests.
- c) The Board should come to a conclusion on its own that the UR Energy case is relevant for these new EAs and they decide what is relevant. We will be making our case on what is relevant.

2. Scoping

Scoping should continue as in the past. If the Board chooses to develop a standard set of scoping questions to use as a tool to help themselves and the interested parties on each EA, the parties should review the draft and comment on it before it is adopted and used.

3. Gathering New Evidence

All the EAs should have Terms of Reference as well as a Developer's Assessment Report. Each EA and project should be separate as it becomes confusing to elders when questions are asked about two or more applications at the same time. There is a need to state that any development is not small as stated, they may be similar but any development that starts may become a lot bigger in the future and should be looked at as such.

4. Public Hearings

Public hearing are very important for communities as well as aboriginal governments and aboriginal people who still to this day live off of the land and depend on it being there for their children and grandchildren.

The MVRMA was created by government to control development so that it is done fairly and environmentally safe and the MVRMA Boards are there to do that. It is the job of the Board to have an EA for each application not to create short cuts for developers or short cuts for the job that is created by the proponent, that the Boards must do.

Our elders will do what must be done at these EAs as well as our resource people. If they have to do it four times then so be it.

Sincerely,



Chris Heron
Environment Manger

- c. All Métis Councils
NWTMN IMA Committee



Northwest
Territories Environment and Natural Resources

November 1, 2007

Mr. Alistair MacDonald
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
Box 938, 200 Scotia Centre
5102-50th Avenue
Yellowknife, NT X1A 2N7

Dear Mr. MacDonald:

Re: Call for Comments on the Conduct of Environmental Assessments in the Upper Thelon River Basin

Thank you for the opportunity to comment on options put forth by the Mackenzie Valley Environmental Impact Review Board (the Board) for conducting Environmental Assessment (EA) proceedings of four uranium exploration projects within the Upper Thelon River Basin.

Please find below the Government of Northwest Territory's (GNWT) response to the Board's October 3, 2007 request to consider options for conducting Uravan – South Boomerang Lake (EA 0708-02), Uravan – North Boomerang Lake (EA 0708-03), Bayswater – E1 Lake (EA 0708-04), and Bayswater – Crab Lake (EA 0708-05).

1. Evidence transfer from the Public Registry for Ur Energy

The GNWT does not believe that it is in the Board's best interest to "roll in" evidence from the Ur Energy EA. We want to review each proposed project on its own merits and believe that transferring information from one EA to another offers the opportunity to incorrectly apply inapplicable evidence. At this time we are also unsure of the precedence the Board could be setting and how this "roll in" process could be misinterpreted by parties and inconsistently applied to future EAs.

2. Scoping

The GNWT believes the scope of the assessment should be generic among all four projects. We do not believe that at this time there are significant differences in their potential impacts or public concerns that need to be considered. However, scoping the assessment for these four EAs to examining only those issues identified during the preliminary screenings may be premature. Past experience has shown that new issues frequently arise from public scoping exercises. The GNWT suggests the Board conduct further community scoping sessions to ensure public input is adequately captured.

- **If, upon completion of community scoping sessions, the public believes these four proposed developments are similar enough to be the subject of a common scoping framework, the GNWT does not object to the Board defining a generic scope of assessment covering all four EAs.**

3. Gathering New Evidence

The GNWT believes that the Board could issue two separate Terms of References. Each Term of Reference would combine the two proposed EAs under one company. By grouping the two projects by the same company under one Terms of Reference, this will cut down on duplication yet allow for the individual companies to prepare separate and unique developer's reports.

Different companies have different corporate ethics, company codes of practice, varying acceptable operating costs and preference of consultants. By having separate Terms of Reference this will allow the companies to express their individuality in satisfying the Board's needs.

Companies are typically competitors and therefore may not want to work together (e.g., sharing intelligence). The companies may also experience scheduling and coordinating challenges so in keeping the two company's EAs separate these concerns can be avoided.

After the proponents have satisfied the needs of the two Terms of References through their separate Developer's Assessment Reports, Information Requests could be used to generate additional information about impacts and mitigation options.

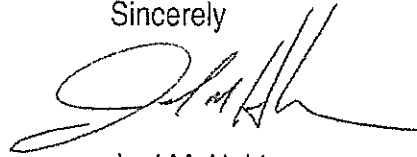
4. Public Hearings

The GNWT suggests that the Board hold two separate hearings – one for the Uravan EAs, and one for the Bayswater Uranium EAs. One full day hearing dedicated to each separate proponent should be enough time to discuss the proposed projects fully. This would be similar to how the Board held hearings for Sidon International and Consolidated Goldwin Ventures this past winter.

Should the two proponents prefer a Joint Hearing of all proposed projects, in an effort to find efficiencies in the EA process, the GNWT would agree.

Should you have any questions or concerns regarding the above, please contact me at 920-6593.

Sincerely

A handwritten signature in black ink, appearing to read 'Joel M. Holder', with a stylized, cursive script.

Joel M. Holder
Environmental Assessment Analyst
Environmental Assessment and Monitoring
Environment and Natural Resources



DENINU KUE FIRST NATION

P.O. Box 1899

Fort Resolution, NT X0E 0M0

Phone (867) 394-4335/4336 Fax (867) 394-5122

November 2, 2007

Alistair Macdonald, Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
Box 938, 5102-50th Avenue
Yellowknife NT X1A 2N7
Fax: (867) 766-7074

**Re: Conduct of Environmental Assessments in the upper
Thelon Basin- (EA0708-02, EA0708-03, EA0708-04, EA0708-05)**

Dear Mr. Macdonald,

In response to the request for comments on how MVEIRB should conduct an EA in the upper Thelon Basin regarding the four environmental assessments currently active, Deninu Kue First Nation supports the letter submitted by NWT Treaty 8 Tribal Corporation dated October 24, 2007.

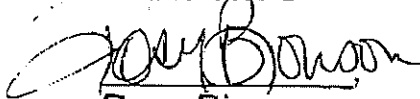
Deninu Kue First Nation recommends that all evidence transferred from the UR-Energy public registry to the four active Environmental Assessments. This will allow for time consuming work that has already been done by First Nation to be considered during this lengthy process.

Deninu Kue First Nation recognizes elders and traditional land users may have difficulties understanding the process; this is why each First Nation has technical staff to review and respond to each application and environmental assessment that occurs. Deninu Kue First Nation recommends that each of the four EA be interpreted into the Dene languages and explained through media both in English and Dene.

Furthermore, Deninu Kue First Nation suggest that if there are going to be scoping sessions, that they be held in each of the Akaitcho Dene First Nations so all elders and traditional land users have a voice and better understanding of what Uranium Development is and how it may impact the environment and livelihood of the Akaitcho Dene.

If you require further inquiry please feel free to contact me at (867) 394-4335.

Marsi Cho☺



Rosy Bjornson
IMA Coordinator, DKFN

Cc: DKFN A/Chief and Council
NWT Treaty 8 Tribal Corporation
Akaitcho IMA/ ASB Regional Office
Akaitcho Territory Government
Mr. Vern Christensen, Chair MVEIRB
Ms. Wanda Anderson, Executive Director MVLWB
Ms. Thrish Mercedi, Regional Director General INAC

Environmental Protection Operations Division
Suite 301, 5204 - 50th Avenue
Yellowknife, NT X1A 1E2
tel: (867) 669-4700

November 2, 2007

Mackenzie Valley Environmental Impact Review Board

Attention: Alistair MacDonald

Re: Call for comments on conduct of environmental assessments in the upper Thelon basin.

Thank you for the opportunity to comment on the various options put forward by the Board for the conduct of the environmental assessments:

Uravan – South Boomerang Lake (EA 0708-02)
Uravan – North Boomerang Lake (EA 0708-03)
Bayswater – E1 Lake (EA 0708-04)
Bayswater – Crab Lake (EA 0708-05).

Environment Canada appreciates this attempt by the Board to ensure the efficiency and effectiveness of the environmental assessment process, and offers the following comments and suggestions with regard to the various options proposed in the Boards' letter of October 3, 2007.

1. Evidence transfer from the Public Record for UR Energy

EC suggests that, in the event the Board decides to transfer evidence from the Public Record for UR Energy, this be done as described in Option #2 under this heading. That is, that the Board invite parties to identify any of their submissions from the UR Energy EA that they feel apply to one or more of the current EAs, with the Review Board retaining the discretion to identify other relevant documents, and making the final determination on what is, or is not, applicable to the current EAs. All parties must retain the ability to identify and provide submissions on additional issues of concern specific to the particular assessment.

2. Scoping

EC recommends that the Board adopt Option #2, and issue a series of scoping questions to all interested parties. EC's rationale for recommending this option is consistent with and has been adequately outlined in the paragraph following the description of Option #2 in the Boards' letter.

3. Gathering new evidence

EC believes that clear and comprehensive Terms of Reference (ToR) are a critical component of any environmental assessment, and recommends the development of ToR for these assessments. However, where efficiencies may be gained, such as by producing generic ToR sections for aspects common to all projects (as outlined in "Option b" under the heading ToR), and clarity and comprehensiveness of the overall ToR are not compromised, the most efficient approach should be adopted.

4. Public Hearings

EC believes Public Hearings are an essential component of the environmental assessment process, and that hearings should be conducted in the most efficient and effective manner possible for all parties. Therefore, EC recommends the adoption of Option #2 under this heading, that is developer-specific hearings – one for UraVan and one for Bayswater scheduled on consecutive days.

If the Board has any questions or concerns regarding the above, please feel free to contact me at 669-4743 or mike.fournier@ec.gc.ca.

Sincerely,

Original signed by

Mike Fournier
Environmental Assessment Coordinator
Environmental Protection Operations Division

cc: Carey Ogilvie (Head, Environmental Assessment North, EPOD)

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

2 November 2007

Alistair MacDonald
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
P.O. Box 938, 5102 – 50th Ave.
Yellowknife, NT X1A 2N7

Dear Mr. MacDonald:

Response to Call for Comments on Conduct of Environmental Assessments in the Upper Thelon River Basin

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on the process to be conducted for the four environmental assessments for uranium exploration proposals by Uravan and Bayswater Uranium in the upper Thelon River Basin, NWT.

The BQCMB appreciates MVEIRB's attempt to reduce duplication of efforts and to increase efficiencies during these next four upper Thelon EAs. The BQCMB is not alone among the parties in having very limited capacity and huge demands and expectations from others on their time and resources. It is also likely that the BQCMB is not alone in having no desire to go through four more EAs like the UR Energy EA, or to see the community of Lutsel K'e put through more hearings to deal with similar proposals with similar issues, *unless* there is a compelling reason to do so.

Our first suggestion is that these next four upper Thelon EAs not be conducted until adequate progress is made on sorting out the broader issues of land and resource management in the upper Thelon basin. Work should be initiated to implement the suggestions made to the Minister as part of MVEIRB's recommendation on the UR Energy proposal before any discussion occurs concerning additional exploration proposals for the area. Indian and Northern Affairs should commit to and establish a timeline for meaningful land use planning, consultation with aboriginal users of the area, and regional assessment of cumulative effects of mineral exploration on barren-ground caribou. At a minimum, these new EAs for proposals in the upper Thelon should not proceed until stakeholders have the opportunity to review the draft plan Minister Strahl has requested "for addressing the broader long term context for land and resource management in the Thelon watershed".

Only when progress has been made toward resolving these broader issues should these upper Thelon EAs proceed. Our preferences for conducting the EAs in the four areas you have identified are outlined below.

Evidence transfer from the public record for UR Energy

Relevant evidence from the UR Energy EA should be transferred to avoid the need to resubmit evidence. However, evidence to be transferred should be identified by the parties who made the initial submissions, as only they can accurately judge what is relevant.

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

In some cases it may be necessary to note that although the evidence from the UR Energy EA is relevant to the new projects under assessment, additional evidence should also be considered in concert with the transferred evidence. For instance, additional information on seasonal habitat use of barren-ground caribou in the upper Thelon area has been collected since the public hearing for the UR Energy EA.

Our preference is for option #2, where parties are invited to identify submissions that should be transferred from the UR Energy EA to the new upper Thelon EAs.

Scoping

A generic scope of assessment covering all four EAs should not be based only on preliminary screening. Additional concerns may be identified by parties that were not described during the preliminary screening. This may result because some parties were not able to participate in the preliminary screening of all four projects that are currently undergoing EA. This was the case for the BQCMB, as we did not receive notice of Uravan's applications in time to submit comments to MVLWB.

New timing and location-specific issues may need to be addressed as well. In terms of potential impacts of proposed exploration activities on caribou and many other wildlife species, timing and location are key elements that must be considered for each application. Despite the similarities in activities proposed for the four applications, it is possible that timing (e.g., season, time of day) and exact location (e.g., habitat, relation to watercourse) may vary sufficiently between project proposals to make potential effects on wildlife significantly different.

Furthermore, it is our experience from the UR Energy EA that companies are sometimes willing to adjust timing of activities during the EA itself, and therefore their proposal and possibilities for some mitigation of effects may change through the EA process. Companies may vary in their ability or willingness to make adjustments, and the characteristics of individual projects may prevent them from adjustments in some cases. Therefore it should not be assumed that no new evidence will be required for assessing the four new applications, or that all four projects are equivalent because their original proposals are similar.

Our preference is option #2, where MVEIRB issues a series of scoping questions to parties, and responses are used to focus on key issues or to develop a generic scope of assessment, as appropriate. Each party should be asked for one submission answering the scoping questions for all four EAs, rather than being asked to submit four separate submissions.

Gathering new evidence

Our preference is to follow a modification of various options outlined, where scoping questions determine whether a generic ToR is required. If so, a generic ToR should be developed to cover most issues, and information requests should be issued as required to fill in gaps for development-specific issues. If a ToR is not required, one or more rounds of information requests should be issued to gather new evidence.

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

Public hearings

Public hearings are the best way to ensure that community members most affected by proposed developments have the opportunity to voice their concerns. However, it does not seem reasonable to ask the people of Lutsel K'e and Deninu Kue to participate in more hearings about uranium exploration in the upper Thelon watershed when they have made their views abundantly clear through the UR Energy public hearing and numerous submissions to MVLWB and MVEIRB. Additional hearings will also consume resources that could perhaps be used more effectively in other ways, or on other assessments.

Our preference is to hold public hearings for these EAs *only* if the people in Lutsel K'e and Deninu Kue choose this option. If hearings are held, we prefer option #2, with one hearing for the Uravan EAs and another separate hearing for the Bayswater Uranium EAs. If no hearings are held (option #1), plain language descriptions of the exploration proposals should be provided to the communities, in English and also in their language. We believe option #3, holding one joint hearing, would be too complicated and difficult to follow, and particularly difficult for elders and interpreters.

Thank-you for the opportunity to comment on the conduct of these four new upper Thelon EAs. We hope our comments are helpful for developing the work plans. Please contact me if you would like to discuss this input from the BQCMB.

Sincerely,

[original signed by]

Leslie Wakelyn
BQCMB Biologist

cc: Jerome Denechezhe, BQCMB Chairperson
Deborah Johnson, BQCMB member for GNWT

A1-3 copy



Indian and Northern
Affairs Canada

Affaires indiennes
et du Nord Canada

P.O. BOX 1500
YELLOWKNIFE, NT X1A 2R3

MVEIRB File Numbers: EA 0708-002, EA 0708-003, EA 0708-004, EA 0708-005

November 2, 2007

Mr. Alistair MacDonald
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
P.O. Box 938, 5102-50th Ave.
Yellowknife, NT
X1A 2N7

VIA FAX: (867) 766-7074

Dear Mr. MacDonald:

RE: Call for Comments on Conduct of Environmental Assessments in the Upper Thelon River Basin

In response to your letter dated October 3, 2007, Indian and Northern Affairs Canada is providing the attached comments on the options presented in the aforementioned correspondence.

If you have any questions about these comments, please do not hesitate to contact Kris Vascotto in Environment & Conservation at (867) 669-2600, or myself at (867) 669-2648.

Sincerely,

David Livingstone
Director, Renewable Resources and Environment Directorate

Attachment A: INAC Comments on Conduct of Environmental Assessments in the Upper Thelon River Basin

ATTACHMENT A: INAC Comments on Conduct of Environmental Assessments in the Upper Thelon River Basin

1. Evidence transfer from the UR Energy file:

Much of the evidence assembled for the UR Energy file may be directly applicable to the four environmental assessments (EAs) in question. In the interests of streamlining the process and preventing duplication, INAC supports the transfer of relevant evidence from the UR Energy file to the current EAs. INAC also recommends that the parties identify what of their submissions to the UR Energy file are applicable to the current EAs with supporting rationale.

2. Scoping:

INAC would like to recommend that additional information on the proposals be made available to all parties. The application packages as provided do not provide sufficient information to effectively delineate the impacts of each project on the social, cultural and biophysical environment. As such, the issues raised during the preliminary screening may not reflect the full scope of concerns associated with each project. INAC therefore suggests that prior to any scoping exercise, additional information from the proponent will be required. Whether this information is presented as a separate document or is presented through a scoping exercise (*i.e.*, scoping session in the communities) remains at the Board's discretion.

INAC agrees with the Review Board that the scope of the four proposals is similar; however, INAC recommends that a formal scope be developed for each environmental assessment. Identification of site-specific components will be necessary to ensure that each project is assessed on its own merit. INAC also requests that these scoping exercises focus on the proposals at hand (*i.e.*, exploration drilling program) and scope in all foreseeable components that can be expected given an unproven resource.

3. Gathering New Evidence

INAC supports the issuance of a formal Terms of Reference (TOR) for each EA. Although the content of these four TORs will be similar, INAC recognizes that some development-specific requirements may be necessary.

4. Public Hearings

INAC recognizes that it is the Review Board's discretion to determine whether hearings are required. Furthermore, it is INAC's view that the Review Board's EA process also plays a role in carrying out procedural aspects of section 35 Crown consultation. Where a development has the potential to cause adverse impacts on established or potential Aboriginal and treaty rights, public hearings provide an opportunity for Aboriginal parties to the EA and any other potentially affected Aboriginal groups to articulate their views on such potential impacts and potential means of accommodating or mitigating such impacts.

Should the Review Board decide that hearings are necessary, INAC suggests that separate hearings be held for each developer, as having two developers present at a single hearing may lead to confusion.

If hearings are required, INAC will participate.



Fisheries
and Oceans

Pêches
et Océans

1/15 copy

Fish Habitat Management
5204 50th Ave
Yellowknife, NT
X1A 1E2

November 5, 2007

Alistair MacDonald
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
P.O. Box 938, 5105 50th Avenue
Yellowknife, NT X1A 2N7

RE: DFO comments on the conduct of environmental assessments in the Upper Thelon River Basin

Dear Mr. MacDonald:

Fisheries and Oceans Canada (DFO) appreciates the opportunity to provide comments on the options that the MVEIRB is currently considering for the conduct of environmental assessments for uranium exploration in the Upper Thelon River Basin (EA0708-02, EA0708-03, EA0708-04, EA0708-05). In response to your letter dated October 3, 2007, DFO is providing the following input for your consideration.

1. Evidence Transfer from the Public Record from UR Energy

DFO supports the inclusion of all relevant evidence from the UR Energy public registry (EA0607-003) that was not specific to the UR Energy project components and to the Screech Lake location. It stands to reason that much of the evidence presented throughout the UR Energy EA will be relevant to the proposed developments and therefore, to avoid the resubmission of this same evidence, DFO supports the first option proposed by the Review Board. It is understood that the MVEIRB will not automatically assume that the evidence provided in the UR Energy EA will be relevant for these EAs without input from the parties.

2. Scoping

DFO recommends that the Review Board issue a series of scoping questions to all interested parties for feedback, and then take these issues into consideration when focusing each EA on certain key issues. DFO supports the second option presented by the Review Board so that each EA can focus on any new considerations and/or considerations specific to the individual EA. DFO is concerned that any specific information pertinent to only one of the developments may be omitted if of a generic scope of assessment is adopted for all four projects.

3. Gathering New Evidence

DFO supports the first option presented by the Review Board where Terms of Reference and a formal Developer's Assessment Report are prepared and submitted for each EA. The developers can choose to cooperate and submit very

similar DARs, or, depending on the unique ToR (see below), submit the same ToR covering each development.

ToR: Option b) Develop a generic Terms of Reference while leaving room for some development-specific requirements for each EA (essentially this would use a generic ToR as the base, but each EA would have its own slightly different ToR which addresses development-specific requirements).

IRs: A formal ToR and a DAR is recommended (eliminating option (a)). Therefore IRs should only be issued after the receipt of the DAR based on a formal ToR for each development.

4. Public Hearings

DFO supports either the second option presented by the Review Board where separate hearings would be held by each developer, or a combination of the second and third options. Although it is recognized that much of the information discussed by both proponents will be very similar, the second option is preferred as it will likely be less confusing to the communities and the most fair to the developers. It is recognized that a joint hearing would address consultation fatigue, however it would have to be very clear to all participants that there are four proposed developments, being led by two different developers.

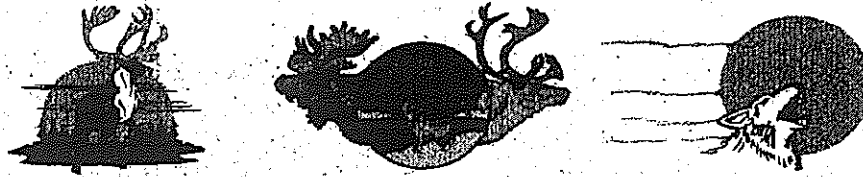
Another possible solution which DFO would support would be to hold a joint hearing, with multiple stages. The hearing could commence with an introductory presentation where general information pertaining to uranium exploration in the Upper Thelon is presented. A general discussion of uranium development in the Upper Thelon would follow. Following this, each developer could discuss their specific projects in detail and allow for public comment on each proposal.

If you have any questions or comments with regards to any of the aforementioned comments, please do not hesitate to contact me at (867) 669-4919 or by email at PechterE@dfo-mpo.gc.ca.

Sincerely,

Beth Pechter
Environmental Assessment Analyst for Major Projects
Fisheries and Oceans Canada
Western Arctic Area

cc:



Athabasca Denesuliné Negotiation Team

November 5, 2007.

Alistair MacDonald
MVEIRB
200 Scotia Centre
Box 938, 5102 - 50th Avenue
Yellowknife, NT X1A 2N7

Fax: (867) 766-7074

Dear Sir,

We ask that our submissions, both verbal and written, from the Ur Energy file be transferred to these new EAs. While we understand that not all elements of our submissions may be applicable to these new EAs, our key concerns and messages have not changed.

These key concerns included the potential effects of proposed Thelon mineral exploration and development on:

- 1) traditional land use,
- 2) important wildlife habitat,
- 3) special ecological and cultural places,
- 4) the lack of benefits for the Athabasca Denesuline,
- 5) overall concern about development happening in the basin before special places are adequately protected through land use planning and conservation initiatives and
- 6) concerns about consultation and development review processes.

We would reserve the right to submit additional project specific materials or clarifications.

Our resources to deal with these EAs are extremely limited and we favour linking the four EAs whenever possible. This includes the scoping, evidence gathering and hearing phases of the assessment. Further we anticipate that the scoping and evidence gathering phases will be limited as most concerns and issues have already been raised. The need for, and the nature of, any public hearing(s) could be addressed after a review of the scoping and evidence gathering phases in case that new issues or concerns are identified.

c/o Prince Albert Grand Council

Suite 206, 1004 - 1st Avenue West, Prince Albert, Sask. S6V 4Y4

Email: robillard@pagc.sk.ca or rgood@pagc.sk.ca

Mailing Address: P.O. Box 2350, Prince Albert, Sask. S6V 6Z1

Phone: 306-922-7612 or 306-922-7613 Fax: 306-763-2973

As demonstrated by point 5 above, the Athabasca Denesuline believe that a plan for resource development and conservation, as acknowledged by the Minister of INAC in his acceptance of the MVEIRB Ur Energy decision, is a prerequisite for further mineral development in the Thelon Basin.

Sincerely,



Ronald Robillard
Chief Negotiator
Athabasca Denesuline

A's
copy

Alistair MacDonald

From: Gordon Davidson [gdavidson@bayswateruranium.com]
Sent: November 6, 2007 3:16 PM
To: Alistair MacDonald
Cc: Vic Tanaka; George Leary
Subject: RE: Deadline for comments on how to structure EAs 0708-004 and 0708-005

Alistair –

I just returned to the office after flying back today from Newfoundland. I realize the deadline for comments is past, but my hesitancy to provide any additional comments to the MVEIRB was largely intentional. We don't have any specific comments as to how the forthcoming EA's are to be structured. Bayswater still wishes to pursue the land use permit application and subsequent environmental impact assessment process. Our projects within the Thelon and Dubawnt River watersheds are important to Bayswater, and we strongly feel that early stage exploration work can be accomplished with no significant environmental impacts. We also feel that social impacts to communities of the Akaitcho nation will be positive based on our experience with exploration projects in Nunavut and their impact on nearby Inuit communities.

Regards,

Gordon Davidson
Vice President, Exploration
Bayswater Uranium Ltd.
Phone (604)687-2153
gdavidson@bayswateruranium.com

From: Alistair MacDonald [mailto:AMacDonald@mveirb.nt.ca]
Sent: November 2, 2007 9:31 PM
To: gdavidson@bayswateruranium.com
Subject: Deadline for comments on how to structure EAs 0708-004 and 0708-005

Dear Gordon,

This is a note that the deadline for the developer to submit comments on how to structure the above stated EAs has passed. Please contact me on Monday; we may be able to accomodate your comments on that date. Please advise if you will be providing comment on that date.

If you have any questions, contact me. All of the relevant questions posed by the Review Board back on October 3, 2007 and directed to you at that time are available on the MVEIRB website public registry - www.mveirb.nt.ca.

Regards,

Alistair MacDonald

06/11/2007