



November 1, 2007

Mr. Alistair MacDonald  
Environmental Assessment Officer  
Mackenzie Valley Environmental Impact Review Board  
Box 938, 200 Scotia Centre  
5102-50<sup>th</sup> 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.

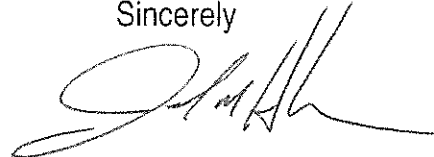
## **4. Public Hearings**

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 'J. Holder', with a long horizontal flourish extending to the right.

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

