

February 8, 2008

Mr. Alistair MacDonald Environmental Assessment Officer Mackenzie Valley Environmental Impact Review Board PO Box 938 Yellowknife NT X0E 0R4

Dear Mr. MacDonald:

Re: Review of the Draft Work Plans for Proposed Uranium Developments within the Upper Thelon Basin (Bayswater EA0708-004 & EA0708-005 and Uravan EA0708-002 & EA0708-003)

The Government of the Northwest Territories (GNWT) has reviewed the aforementioned work plans and would like to put forward the following comments for consideration.

Section 4.1 (All Work Plans)

- In an effort to help MVEIRB better determine the potential impacts on the social environment, the proponents should be asked to better define the economic benefits of these proposals.
- In the work plan for the Ur Energy Environmental Assessment (EA0607-003) MVEIRB created a table that contained the issues identified through a review of documents transferred from the record for EA0506-003. The table also provided a brief description of each issue and how it was identified as well as a brief discussion of whether the issue was relevant to the environmental assessment. The GNWT found this table useful in understanding how MVEIRB considered information from a past environmental assessment.

For all four current environmental assessments, when considering the final scope of the assessments, the Review Board plans to consider relevant evidence transferred from the public record of EA0607-003. The GNWT suggests that the Review Board again produces a similar table as was done for the Ur Energy Work Plan.

 In the Work Plan for EA0607-003, when MVEIRB created the table of past issues and documents to be transferred, tourism and tourism documents were identified as being relevant. All four of the currently proposed uranium drilling projects have similar attributes (geographic location, transportation methods and activity type) as the Ur Energy proposed uranium drilling program. This being the case, the GNWT suggests that the tourism issues and documentation from EA0607-003 be considered relevant and within the scope of assessment for all four environmental assessments.

Bayswater Uranium Work Plans (EA0708-005 & EA0708-004)

Section 4, Scope of Assessment

 Given that under Section 3, Scope of Development, MVEIRB includes the establishment of a field exploration camp and fuel cache near Crab Lake, the GNWT would like to see impacts to carnivores to be included under Scope of Assessment.

Thank you for the opportunity to provide comments on the draft work plans. Should you have any questions regarding the above, please contact me at 920-6593 or by e-mail at joel_holder@gov.nt.ca.

Sincerely

Joel M. Holder Environmental Assessment Analyst Policy, Legislation and Communications Environment and Natural Resources