



# **EA0607-003 Ur Energy Uranium Exploration Screech Lake**

## **Information Requests**

**IR Number:** IR0607-003-01  
**Source:** MVEIRB  
**To:** Government of the Northwest Territories  
**Issue:** Tourism

### **Preamble**

Concern over negative impacts on the tourism industry from mineral resource development has been raised during EA0506-003, a previous assessment of the proposed development. For the Review Board to determine whether the proposed development may have a significant impact on the social or cultural environment by way of negatively affecting tourism, it needs to know the value of tourism to the potentially affected area.

### **Request**

To the extent possible, please provide the following information:

1. Value of tourism industry to Akaitcho Region, including projections for future development; expressed as total and as proportion of the overall economy.
2. Number of persons employed in the tourism industry in the Akaitcho region; including projections for future development; expressed as total and as proportion of the overall economy.
3. Any other relevant information that would allow the Review Board to determine the importance of the tourism industry to aboriginal communities, in terms of economy, heritage, cultural or social aspects.

**IR Number:** IR0607-003-02  
**Source:** MVEIRB, Treaty 8 Tribal Corporation  
**To:** Indian and Northern Affairs Canada  
**Issue:** Industrial Developments (Cumulative Effects)

### **Preamble**

Cumulative effects are an important issue in this environmental assessment. To assess cumulative effects, knowledge of other past, present, or reasonably foreseeable future development is a basic requirement. It should be noted that in the Review Board's definition of reasonably foreseeable development is not limited to proposed developments that have entered the regulatory process.

As the driver behind the Cumulative Effects Assessment and Management Framework and the Cumulative Impact Monitoring Program, as well as being the administrator of crown lands, mineral claims and leases, etc., INAC is in the best position of any party in this EA to provide relevant information on other developments and their anticipated combined impacts.

### **Request**

To the extent possible, please provide the following:

1. A map or a series of maps showing all known past and current mineral developments, including exploration programs, within the Thelon watershed. It should be possible for parties to distinguish between developments of different age and footprint.
2. A projection, e.g. in form of a map or series of maps, where future development might occur for the same area. This projection should be based on the potential for resources to be available. Known proposed developments should be identified individually. As a minimum the analysis should show areas of different likelihoods for further development.
3. Any analysis of cumulative effects in the project area INAC can provide.
4. All maps should be submitted in electronic format to allow analysis in the MVEIRB's geographic information system. INAC is encouraged to consult with the GNWT to provide maps of comparable scale for this IR and IR0607-003-03

**IR Number: IR0607-003-03**

**Source: MVEIRB**

**To: GNWT**

**Issue: Tourism/Harvesting Developments (Cumulative Effects)**

### **Preamble**

Various submissions to EA0506-003, the previous assessment of the same development, as well as to EA0607-003 have stressed the importance of cumulative effects. Concerns over cumulative effects, i.e. effects of the proposed development in combination with other past, present, and reasonably foreseeable future developments, are a key issue in this assessment.

To assess cumulative effects, knowledge of other past, present, or reasonably foreseeable future development is a basic requirement. It should be noted that in the Review Board's definition of reasonably foreseeable development is not limited to proposed developments that have entered the regulatory process.

### **Request**

To the extent possible, please provide the following:

1. A map or a series of maps showing all known past and current tourism, hunting, outfitting, or related developments within the Thelon watershed
2. Operating seasons of the identified developments.
3. Total number of caribou harvested under hunting or outfitting licences in the Thelon watershed.
4. A projection, e.g. in form of a map or series of maps, where future development might occur for the same areas. As a minimum the analysis should show areas of different likelihoods for further development.
5. A projection of the number of animals likely to be harvested in the future.
6. Any analysis the GNWT can provide on what the likely impacts from the proposed development on tourism will be. This should include the best options for timing of the development to minimize impacts.

All maps should be submitted in electronic format to allow analysis in the MVEIRB's geographic information system. The GNWT is encouraged to consult with the INAC to provide maps of comparable scale for this IR and IR0607-002-02

**IR Number:** IR0607-003-04  
**Source:** MVEIRB  
**To:** World Wildlife Fund, Lutsel K'e Dene First Nation  
**Issue:** Special Values of Project Area

### **Preamble**

The World Wildlife Fund and the Lutsel K'e First Nation have indicated that they are actively seeking protection of the project area either within a proposed national park or within special management areas for the Thelon Game Sanctuary. The MVEIRB's work plan for this EA identifies land use planning and land withdrawal as beyond the scope of the EA. It does, however, provide for the consideration of special values of the area and their protection through mitigation measures.

To determine whether the proposed development is likely to cause significant adverse impacts on the environmental, cultural, or heritage values that make the project area a candidate for a conservation area, the Review Board requires a description of these values and the threats to them.

On May 19, 2005 the MVEIRB wrote to the Lutsel K'e Dene First Nation asking several questions in preparation for a hearing for EA0506-003, the previous assessment of the same project. The following information was provided to the LKDFN

*In preparation for the public hearing on June 29, 2005, the MVEIRB would like to pose a few questions to you. The Board is not looking for any kind of comprehensive document but rather it is interested in obtaining basic information on a number of key items. The purpose of these questions is to provide all participants in the hearing with a common understanding of the issues. Please provide your answers, to the best ability within the admittedly very tight time frame, on or before June 3, 2005.*

*In addition to the information already contained in your letter to the MVLWB of April 14, 2005 could you please provide the following:*

- 1. Some details regarding the cultural significance of the project area. Are there individual sites that are significant? Are there certain areas within the region that are more significant than others? On what is the significance based on, such as historic events, spiritual sites, etc.?*
- 2. Information about the importance of the area for hunting and fishing, such as which species have been harvested historically, are being harvested today, and during what time of the year harvesting does commonly occur in this area. Also, if possible, provide an estimate of the volume of harvesting in that area relative to the total harvesting by the community.*
- 3. Any available documentation of efforts to include the project area within the Thelon Game Sanctuary, a related special management area, or within the proposed East Arm national park.*

Submissions to EA0506-003 by the Word Wildlife Fund and by the Treaty 8 Tribal Corporation provided information on the first and second question. Correspondence between the MVEIRB and the LKDFN indicated that more information may be forthcoming following an elders meeting but EA0506-003 was cancelled before any additional information could be received.

**Request**

Please provide any additional information you may have that can help the Board to assess the importance of the project area in terms of its cultural significance, importance to harvesting and any special values that in your opinion require special protection. The questions posed to the LKDFN during EA0506-003 and listed in the preamble above may be used as guidelines.

**IR Number:** IR0607-003-05  
**Source:** BQCMB, LKDFN, Environment Canada, GNWT  
**To:** Developer  
**Issue:** Timing of Activities

### **Preamble**

The LUP application is for a 5-year permit (January 1, 2007 to December 31, 2011). However, several sections of the application detail different time periods. Section 3 states March 1-May 31, 2007. Section 5 states that up to 20 drill holes may be developed over the course of the “two year program”, and later in the section states that “*the initial program will begin as early as March 2007 and end in May 2007. The majority of drilling will occur during the winter of 2007/2008], but may continue for the remainder of the permit period*” Section 14 states “*March 1, 2007 to May 31, 2007 to complete proposed exploration as outlined above (5). May 31, 2007 to December 31, 2011 to complete further work contingent upon results of work outlined in (5)*”.

The proposed timing of the development is unclear, particularly the timing of activities following the first season. The wording in the application could be interpreted to mean any time, i.e. at any time of the year, until 2011. Parties to the EA, as well as the Review Board, require clarification of the project timing.

Given the overlap of the proposed timing of the development with caribou presence in the project area, the Review Board requires more detailed information on the timing of activities related to the development.

### **Request**

1. Please clarify the maximum duration of the proposed development and during which months activities would occur.
2. Please provide any alternatives to the preferred timing that exists, e.g. carrying out the program earlier in the winter season. Give reasons why alternatives may be less favourable than the preferred timing.
3. Clarify when during the five years of the proposed permit length the 20 holes will be drilled. Or if all 20 holes are to be drilled within a two year period why you require a five year permit. Also clarify why drill hole locations may not be known exactly up until 48 hours from when drilling is to commence.
4. Provide detailed information on timing of proposed activities including:
  - How long will it take to drill each hole?
  - Will drilling be continuous during that time or intermittent?
  - What is the anticipated length of time to move a rig?
  - What is the length of time required for mobilization and demobilization?

**IR Number:** IR0607-003-06  
**Source:** BQCMB, GNWT  
**To:** Developer  
**Issue:** Air Traffic

**Preamble**

The permit application states that all movement of equipment and personnel will be by helicopter, but does not provide details concerning the timing, frequency or number of flights that will occur for the drilling program or during camp set-up or removal.

**Request**

Please describe

1. The number, timing, type and frequency of flights required for camp set up, support and removal, and for moving crews, equipment and supplies during the exploration work (to/from and within the study area), as well as
2. Whether an airstrip is required for fixed wing aircraft and its length, if it is required.

**IR Number:** IR0607-003-07  
**Source:** BQCMB, GNWT, Treaty 8 Tribal Corp., LKDFN  
**To:** Developer  
**Issue:** Best Practices

### **Preamble**

Several parties submitted information requests asking for clarification on what the developer means by the term 'best practices'. The developer's application refers to best practices a number of times. For example, the report states that "the use of mufflers and best work practices should partially mitigate" these effects (pg 63). The application also refers to *Exploration Guidelines for Saskatchewan* that will be used as best practices.

Referring to a set of guidelines containing "best practices" does not provide sufficient information for the Review Board to determine if the development is likely to cause significant impacts on the environment. The developer must identify which best practices will be used under what circumstances and who will be responsible for these decisions.

### **Request**

1. Please describe the relevance and applicability of the Saskatchewan guidelines to your operations in the Thelon watershed.
2. Provide a listing and brief description of "best practices" for dealing with uranium if it is encountered.
3. Please provide a listing and brief description of the "best practices" you are proposing to use to mitigate against impacts on caribou, migratory birds, and other wildlife.
4. List and briefly explain what criteria will be used to decide when to apply a specific best practice or mitigation measure.
5. Please identify the person or persons that would decide in the field which best practice or mitigation measure will be used. What qualifications are required of this person or these persons.
6. Please clarify how archeological resources will be protected during the operation, including a description of the qualification of the field personnel to recognize archeological sites.



**IR Number:** IR0607-003-08  
**Source:** BQCMB  
**To:** Developer  
**Issue:** Caribou Mitigation

### **Preamble**

IR0607-003-08 requests a listing and brief description of “best practices” proposed by the developer in general. Given the importance of caribou to the socio-economic and cultural well being of aboriginal communities and given the recently observed decline in the caribou herds utilizing the project area, more detailed information on the prevention of impacts on caribou is required.

The BQCMB submitted that *“although the proponent correctly identifies the project area as being located on a primary spring migration route for barren ground caribou, they propose that drilling activity occur during the caribou spring migration period (April and May). It is unclear whether the proponent recognizes the vulnerability of pregnant caribou during this period or the risk that disturbance may impose on the health of caribou cows or their fetuses, particularly during the month of May when cows are in poorest condition and may be weakened by further stresses. The permit application and application fail to adequately describe potential impacts to barren ground caribou during spring migration and mitigation measures to address these issues.”*

Similarly, the application states that “As much of the exploration activities will occur during winter months a low residual impact is anticipated for wildlife” (p. 63). However, the proponent acknowledges that there may be caribou present in the area during the winter period. The permit application and application fail to adequately describe potential impacts of exploration on barren ground caribou in their winter range and mitigation measures to address these issues.

### **Request**

Please provide additional detail on the following:

1. Actions that will be taken to avoid or mitigate potential impacts from camp set up, support and maintenance, and exploration activities while caribou are migrating through the study area, particularly where drilling will occur within 5 km of key water crossings.
2. Measures that will be employed to ensure that the residual impact of exploration activities on barren-ground caribou during winter will be low. This should include actions that will be taken to reduce the impacts on caribou during winter from drilling and from flights required to move people or materials.

**IR Number:** IR0607-003-9  
**Source:** BQCMB, GNWT, Tribal 8 Treaty Corporation, LKDFN  
**To:** Developer  
**Issue:** Methods and Conclusions

### **Preamble**

Several parties indicated that the developer's application provides a number of conclusions without providing sufficient analysis or information on how the conclusion was derived. For example, the BQCMB submitted that 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 at the same time on both sides of the Thelon River (approximately 15 km apart) in an area which has been identified as a primary spring migration route for barren ground caribou, and where there are many key water crossings. The authors conclude that both overall impacts on wildlife and cumulative impacts "are anticipated to have a negligible environmental consequence" (p. 64).

In another example the BQCMB points out that according to the application, traditional hunting and trapping by Lutsel K'e residents occurs in the region (p. 45), fishing and hunting have been practiced by up to 74% of the people of Lutsel K'e as recently as 2003, up to 34% of residents have trapped as recently as 1998. These are some of the highest rates of traditional land use for NWT communities (p. 57). The authors appear to have only evaluated the direct effects of exploration on current land use activities such as trapping and hunting, but not any indirect impacts, such as displacement of animals, to conclude that the residual impacts of the exploration project on traditional land uses will be negligible (p. 65).

The LKDFN also points out that section 5 of the application states that all holes will be "*located in close proximity to Screech Lake (within 1.5km of the western end of Screech Lake), but may proceed into the other proposed areas depending on the findings. It is possible that drilling will take place near the Screech Lake shoreline.*" Furthermore, the application states that 5 initial holes are proposed, but if the results are positive a maximum of 20 holes may be developed (Section 5). Later in the same section, it states that "*the final location coordinates of each of the drill sites will be submitted to the Site Inspector at least 48 hours before the start of drilling activities*".

Section 5 of the application states that "*during a previous drill program it was observed that permafrost was not present at the Screech Lake location*". The application (3.5.1) states that "*the regionally present permafrost layer is not present in the immediate vicinity of Screech Lake*". However, later the report states "*it is expected that concerns of operations on permafrost will be the primary focus in the study area*" (4.3.2.1).

Section 6 of the application under Traditional Land Use states that “*hunting and trapping activities occur within the region of the target area, mitigation measures include no hunting or trapping and no disturbance linked to these activities*”. As well, the Golder report states that “*available databases and publications were reviewed to determine traditional land use around the Screech Lake area. Government regulators, hunter trapper organizations, and local outfitters were consulted to identify hunting and trapping activities in the Screech Lake area*” (6.1).

Moreover, the application states that “*Great Canadian Ecoventures reported bringing approximately 200 people through the upper Thelon River each year, which includes the locally named “Double Barrel Lake” located less than 15km south of the Screech Lake area*”, and then goes on to state that “*with the exception of canoeing, the overall recreation potential of the area has been described as limited (INAC 1979)*” (6.2.3.8).

**Note:** Pursuant to the work plan for EA0607-003 this information request is not intended to result in significant new data collection or analysis. Rather it is aimed at revealing the analysis that has already been conducted to justify certain conclusions by the developer.

## **Request**

Please provide:

1. The methods and results of the analysis conducted to determine that residual impacts on caribou will be minor.
2. The methods and results of the analysis conducted to determine that overall impacts on wildlife and cumulative impacts (i.e. in combination with other developments) will have a negligible environmental consequence.
3. Methods and results of assessing the indirect effects of the proposed project on traditional caribou harvesting. These indirect effects would include a possible change in migration routes to avoid the project area that could result in reduced availability of caribou for hunters from Lutsel K’e.
4. What information 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), including cumulative impacts in combination with other developments, e.g. Uraivan’s nearby exploration program.
5. Confirmation that locations of drill holes cannot be determined in advance. Also describe how much flexibility exist in the selection of locations. For example, can techniques such as directional drilling be used?
6. A definition of the “immediate vicinity” of Screech Lake (i.e. does it include only the area outlined in the application. Has the existence/non-existence of permafrost been confirmed for the other potential drilling locations outlined in the application?
7. Clarification of the statements regarding absence of permafrost: if there is no permafrost in the Screech Lake area, why would concerns of operations on permafrost be the primary focus?

8. Clarification of the statement in section 6 of the application regarding no hunting and trapping as mitigation; does this mean no hunting and trapping by the developer's employees or contractors? Also of the statement regarding "no disturbance linked to these activities". How will you ensure that First Nations people who may be hunting and trapping in the area (and the animals they are hunting and trapping) will not be disturbed by the noise from drill rigs/helicopters/airplanes, and the presence of an exploration camp in what was a pristine wilderness area?
9. Any information on community consultation you may have conducted in addition to that reported in the application.
10. A clarification of how potential impacts on tourism were assessed given that the 1979 report from INAC cited in the application may be outdated.
11. Where reference to cumulative effects is made in the application, which other developments were considered.

**IR Number:** IR0607-003-10  
**Source:** LKDFN  
**To:** Developer  
**Issue:** Noise Impacts

**Preamble:** In Section 6 of the LUP application, for noise levels it states that “*the proposed activity is local, of short duration and the impact is reversible therefore the overall impact is considered negligible*”.

**Request:**

1. Has noise from helicopter and airplane activity been factored into the overall estimate of noise levels, or is it just for the drill rig?
2. Clarify how the impacts from noise, not just the presence of noise are reversible.
3. Has the impact been assessed separately for humans and animals and if so for which animal species?

**IR Number:** IR0607-003-11  
**Source:** LKDFN  
**To:** GNWT  
**Issue:** Noise Impacts

**Preamble:** In Section 6 of the LUP application, for noise levels it states that “*noise levels are not expected to exceed 94 dBA at 10m beyond the drill rig and will be well below any current regulatory criteria*”. In the Golder report (3.7.2.2), it states that “*while there are no published noise criteria in the NWT, the Alberta Energy and Utilities Board remote area criteria at 40 dBA at 1500m from activity is often used*”.

**Request:** Please clarify what the current regulatory criteria are for noise levels, how they are determined, and if there are species-specific criteria. If no NWT specific criteria exists, please explain which other criteria may be used and how they are to the NWT in general and the Thelon area in particular.

**IR Number:** IR0607-003-12  
**Source:** LKDFN  
**To:** Developer  
**Issue:** Impacts on Non-Traditional Land Use

**Preamble:**

Section 6 of the application under Non-Traditional Land Use states that “*non-traditional trap lines are not registered within 50km of Screech Lake, and domestic and sport hunting is conducted through Artillery Lake (150km west). It is anticipated that the winter timing will reduce any disturbance...*” However, the Golder report states that “*domestic hunting and fishing information is unavailable*” (6.2.3.2).

**Request:**

1. Clarify how winter timing will reduce disturbance to both trappers (who operate mainly in the winter months) and the animals they are trapping, who often have large home ranges and may very well be passing through the Screech Lake area at some time during drilling operations.
2. Clarify how winter timing will reduce disturbance to domestic hunting, especially given that there is no information available. The Golder report (4.2.2.1) states that “*the Screech Lake program area is located in the spring range of the Beverly herd and is used between mid-March and late May*” (times when drilling is likely to be occurring), that “*some caribou of the Bathurst herd over-winter near the Screech Lake Program area*”, and that the Qamanirjuaq herd “*may use habitats near the Screech Lake Program area during spring/fall migration and the post-calving period*”. In particular, please clarify the following statement: “*Although the hunting season for most species is during the anticipated drilling Program, it is anticipated that the winter exploration activity will reduce any disturbance of hunting activity*” (Golder report, 8.2.9). If the hunting season coincides with the timing of the drilling program, how will this reduce disturbance of hunting activity?

**IR #:** IR0607-003-13  
**Source:** NWT Treaty #8 Tribal Corporation  
**To:** GNWT  
**Issue:** Archaeological and cultural resources

**Preamble**

The Treaty 8 Tribal Corporation submitted that “*UR-Energy recognized the likelihood that its proposed activities would encounter previously unrecorded archaeological sites, and indeed anticipated a heritage assessment. However, the Prince of Wales Northern Heritage Center determined that a heritage assessment was not needed in the area of proposed exploration activity. This determination was made without consultation with any of the Akaitcho Dene First Nations. Had consultation occurred, the Prince of Wales Northern Heritage Centre would have been made privy to the fact that Akaitcho considers the area between Beaverhill Lake and the Thelon River to be of extremely high cultural significance. It is certain that unrecorded archaeological sites exist in the area, and the Akaitcho Dene have identified some particularly special burial and historic sites connected to cultural legends and stories. Without proper documentation of these sites and implementation of protective measures, it is likely that they will be compromised by exploration activities.*”

While impacts on archeological resources per se where not defined as being within the scope of the EA in the work plan, information related to the presence and protection of archeological resources is directly related to the issue of cultural importance of the area, which is within the scope of the EA.

**Request**

Given the likelihood that unrecorded archaeological sites may be found in the area of activity proposed by UR-Energy, how will the PWNHC (GNWT) ensure that heritage resources are protected?