

EA0607-003 Ur Energy - BQCMB Information Requests

1) IR Number: Number is assigned by MVEIRB
Source: BQCMB
To: Ur Energy
Issue: Scope of Development – Project Description - Timing

Preamble:

Inconsistent and incomplete information is provided concerning the time period and seasons during which development is proposed. The developer's land use permit application and their environmental screening study are particularly vague regarding the timing of proposed work after the first March-May 2007 drilling program.

Request:

Please provide information about the maximum time period proposed for this development and the timeframe and months in which exploration work would occur after the first March-May 2007 drilling season.

2) IR Number: Number is assigned by MVEIRB
Source: BQCMB
To: Ur Energy
Issue: Scope of Development – Project Description – Aircraft use

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 the number, timing, type and frequency of flights required for camp set up, support and removal, and for moving crews during the exploration work (to/from and within the study area), as well as whether an airstrip is required for fixed wing aircraft.

3) IR Number: Number is assigned by MVEIRB
Source: BQCMB
To: Ur Energy
Issue: Effects of drilling activities on wildlife

Preamble:

The screening report states that “temporary displacement and stress on individuals” will likely result from noise, lights and dust generated by drilling activities (p. 63), and that disturbance to wildlife resulting from these activities will be frequent (p. 64). The authors acknowledge that the use of mufflers and best work practices will at best “partially mitigate” these effects. They then conclude that “residual impacts to wildlife and wildlife habitat are anticipated to be minor in magnitude” and that both overall impacts on wildlife and cumulative impacts “are anticipated to have a negligible environmental consequence” (p. 64). The permit application states that the impact of noise is reversible.

Request:

Please provide information to support these statements including:

- The best practices that will be used to mitigate the effects of drilling activities, including practices intended to reduce effects on caribou.
- Methods and results of the analysis conducted to determine that residual impacts will be minor.
- Methods and results of the analysis conducted to determine that overall impacts on wildlife and cumulative impacts will have a negligible environmental consequence.

4) IR Number: Number is assigned by MVEIRB
Source: BQCMB
To: Ur Energy
Issue: Wildlife impacts and mitigation measures

Preamble:

The screening report states that “While potential migration routes exist within the target area mitigation measures throughout the drilling Program will be taken to reduce the interaction and disturbance of any migratory animals, local birds, and vegetation within the target area.” (p. 63)

Request:

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

5) IR Number: Number is assigned by MVEIRB
Source: BQCMB
To: Ur Energy
Issue: Caribou impacts and mitigation measures – Spring migration

Preamble:

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 screening report fail to adequately describe potential impacts to barren ground caribou during spring migration and mitigation measures to address these issues.

Request

Please identify the following:

- Direct and indirect impacts of camp set up, support and maintenance, and exploration activities on caribou during spring migration.
- Mitigative actions that will be taken to avoid or mitigate potential impacts while caribou are migrating through the study area, particularly where drilling will occur within 5 km of key water crossings.

6) IR Number: Number is assigned by MVEIRB
Source: BQCMB
To: Ur Energy
Issue: Caribou impacts and mitigation measures – Winter

Preamble:

The screening report 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 screening report fail to adequately describe potential impacts of exploration on barren ground caribou on their winter range and mitigation measures to address these issues.

Request:

Please indicate what mitigation measures 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.

7) IR Number: Number is assigned by MVEIRB

Source: BQCMB

To: Ur Energy

Issue: Cumulative effects on caribou

Preamble:

The MVLWB approved a land use permit for Uravan's Boomerang Lake operation for May 2006 – May 2008, and Ur-Energy has requested a permit for Jan/07 to Dec/11. Therefore there is potential for the Uravan and Ur-Energy drilling programs to be run concurrently in winter-spring 2007/08, or perhaps additional years if Uravan receives additional permits or extensions. Consequently, exploration activities may occur 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).

Request:

Please provide the methods and results of the analysis that was used to determine that the cumulative impact on barren ground caribou of this development in combination with the Uravan development would be negligible.

8) IR Number: Number is assigned by MVEIRB

Source: BQCMB

To: Ur Energy

Issue: Effects of exploration activities on traditional land uses

Preamble:

According to the screening report, 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, and 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, and on this basis conclude that the residual impacts of the exploration project on traditional land uses will be negligible (p. 65).

Request:

Please indicate how the indirect effects of exploration were taken into account when assessing the residual impacts 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.

9) IR Number: Number is assigned by MVEIRB

Source: BQCMB

To: MVEIRB

Issue: Cumulative impacts on caribou

Preamble:

Sec. 117(2) of the MVRMA requires the MVEIRB to include consideration of “the impact of the development on the environment, including . . .any cumulative impact that is likely to result from the development in combination with other developments” and “the significance of any such impact”. In the work plan for this EA, MVEIRB acknowledges that “Cumulative impacts on caribou (and associated harvesting and cultural impacts) are an important consideration in this assessment.”

Because barren-ground caribou herds migrate annually across a large area, they can be exposed to a large number of developments over time and space. Therefore cumulative effects assessment for barren-ground caribou should include consideration of developments across their ranges. The 25-km radius used by Ur-Energy to assess cumulative effects of their proposed project is clearly not adequate for evaluating cumulative impacts on migratory barren-ground caribou.

Request:

Please explain how the following will be assessed during this EA:

- The cumulative impact of this proposed development in combination with other developments (particularly other mineral exploration activities) across the Beverly and Ahiak caribou ranges, which include portions of NWT, Saskatchewan, and Nunavut.
- The impact on caribou harvesting that would potentially result from reduced availability of caribou for hunters following a change in migration routes to avoid the project area.
- The significance of these impacts on caribou and on people who rely on commercial or subsistence harvesting of these caribou herds.