



Environmental Protection Operations  
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22 May 2008

Our File 4704 004 007

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Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
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**Re: NWB 2BE-BUG0712: Additional Information Received Water License Application – Bugs Project - UR-Energy Inc.**

Environment Canada's (EC) contribution to your request for specialist advice is based on the mandated responsibilities for the enforcement of **Section 36(3)** of the *Fisheries Act*, the *Canadian Environmental Protection Act* (CEPA), the *Migratory Birds Convention Act* (MBCA) *Regulations* and the *Species at Risk Act* (SARA).

The proponent shall insure that any chemicals, fuel or wastes associated with the proposed project do not enter waters frequented by fish. It is a requirement of Section 36(3) of the *Fisheries Act* that all effluent discharged into water frequented by fish, be non-deleterious.

Previous comments and recommendations submitted by Environment Canada staff for the proponents "Bugs Project" would be applicable to the above noted project and Environment Canada would like to add the following comments and recommendations:

**Comments and Recommendations**

- How will the proponent, permanently and properly return any radioactive cuttings/core to holes drilled through the ice?
- Groundshine radioactivity levels should be recorded at each land based drill site prior to the commencement of drilling. If any drill cuttings/core retrieved from the land based drill hole exceed the established groundshine levels at the site and the drill cuttings/core are not being kept, then the drill cuttings/core should be returned to the hole and the hole properly and permanently sealed.
- Under the proponents Emergency Contact Information and Fuel Spill Contingency Plan, the Environment Canada contact information should be changed to the following:
  - **Environment Canada Fax: (867) 873 - 8185**
  - **Environment Canada 24 Hour Duty Officer NT/NU (867) 766 – 3737**

EC should be notified of any changes in the proposed or permitted activities associated with this application.

Please do not hesitate to contact me at (867) 669-4744 or ron.bujold@ec.gc.ca with any questions or comments.

Yours truly,

Ron Bujold  
Environmental Assessment Technician

cc: Carey Ogilvie (Head, Assessment & Monitoring, EPO)  
Mike Fournier (Northern Environmental Assessment Coordinator, A&M, EPO)