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Department of Environment

Ministère de l'Environnement

March 17, 2008
Richard Dwyer
Licensing Administrator
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB FILE # 2BE- BUG0712 – UR-Energy Inc. – Bugs Uranium Exploration Project

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license amendment application from UR-Energy Incorporated regarding Bugs uranium exploration project. The following comments are being reiterated from the initial water license application process.

SPILL CONTINGENCY:

Based on the DOE *Spill Contingency Planning and Reporting Regulations, Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*, and *Guideline for the General Management of Hazardous Waste in Nunavut*, we have the following comments and recommendations to make:

- A site map that is intended to illustrate the facilities relationship to other areas that may be affected by the spill, and should be provided once a camp is set up. The map should be to scale and be large enough to include the location of your facility, nearby buildings or facilities, roads, culverts, drainage patterns, and any nearby bodies of water.
- An inventory of response and clean up equipment available to implement the plan should be included in the spill plan. This includes your equipment as well as any to be used by another person responding to the spill on your behalf.
- The DOE monitors the movement of hazardous wastes from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register at DOE with Robert Eno at reno@gov.nu.ca or (867) 975-7748.
- The NWT-Nunavut spill report form has been updated, and can be obtained from the Spill Line. The proponent is advised to enter spill information electronically in the form so the information is legible to regulators inspecting spills.

ABANDONMENT & RESTORATION

Based on the DOE's *Guideline for Contaminated Site Remediation*, we recommend the following:

