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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-KAZ0609 – Pacific Ridge Exploration Ltd. – Kazan Falls Uranium Exploration Project

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license amendment application from Pacific Ridge Exploration Ltd. for conducting uranium exploration near Kazan River and has the following comments and recommendations to make.

DOE accepts the proponent's request of grouting the upper 15 m of bedrock as long as no groundwater is encountered during drilling. If encountering groundwater (e.g. Artesian well) then the entire length of the drill hole should be cemented (grouted).

DOE continues to express its concern over exploration for Uranium with regards to the requirements of the Keewatin Regional Land Use Plan. We are aware that Nunavut Planning Commission has determined low level exploration for Uranium to be in conformity with the Keewatin Regional Land Use Plan despite the following;

(pg.65) of the Keewatin Regional Land Use Plan states:

> *3.5 - Uranium development shall not take place until NPC, NIRB, NWB and the NWMB have reviewed all of the issues relevant to uranium exploration and mining. Any review of uranium exploration and mining shall pay particular attention to questions concerning health and environmental protection. (A) (CR)*
>
> *3.6 – Any future proposal to mine uranium must be approved by the people of the region.*

There is concern that the issuing of permits relating to exploration for uranium may lead to an expectation that further development of these projects will be permitted. INAC should clearly indicate to proponent the provisions of the appropriate land use plan.

The Keewatin Regional Land Use Plan conformity requirements stipulate that the completion of a review to address environmental and health related matters on uranium exploration and mining, in advance of any uranium development. NPC has stated that

there needs to be a full discussion and debate of all the issues as well as further moral and political questions of Kivalliq residents, involving community organizations, co-management bodies, and government before uranium development is considered. In particular, the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) should be consulted given that it was established as a direct result of the concerns of communities in the Thelon basin, particularly Baker Lake, over uranium development.

DOE recommends that the actions and conformity requirements as outlined in the Keewatin Land Use Plan be concluded in advance of any further permitting of uranium development including any further uranium exploration in the Kivalliq region; whereby NWB, NPC, NIRB, and the NWMB conduct a review of all issues relevant to uranium exploration and mining and that the proponent engage in community consultations.

THE CANADIAN HERITAGE RIVERS SYSTEM

We also are concerned regarding permit areas requested along a Canadian Heritage River, Kazan River. Please note that The Canadian Heritage Rivers System (CHRS) is Canada's national program for freshwater conservation. The objectives of the program are to give national recognition to Canada's outstanding rivers and to ensure long-term management that will conserve their natural, cultural and recreational values for the benefit and enjoyment of Canadians, now and in the future.

We ask the prospectors to respect the values of the Heritage Rivers (refer to the management plans provided by CHR Board) and not to engage in any activity that would interfere or other wise detract from the experience of tourists and Nunavummiut using the Heritage Rivers now and in the future.

The GN thanks NWB for the opportunity to provide comments on this water license application. Please contact us if you have further questions.

Yours sincerely,

Original signed by

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