



June 16, 2008

Mackenzie Valley Environmental Impact Review Board
5102 – 50th Avenue, PO Box 938
Yellowknife, NT X1A 2N7

Attention: Allan Ehrlich
Senior Environmental Officer

RE: Further Submissions-- EA 0708-02 and EA 0708-3 Boomerang North and South Projects Proposals

Pursuant to the Mackenzie Valley Environmental Impact Review Board (the "Review Board") Letter dated May 2, 2008, titled "Request for Further Submissions" (the "Submissions"), Uravan Mineral Inc. ("Uravan") has the following comments in connection with the Submissions and the Environmental Assessments (EA0708-003 and EA0708-002) (the "Uravan EAs") for the Boomerang Lake North and South Mineral Exploration project proposals ("Boomerang project proposals").

Statement of Principle

Uravan honours the Akaitcho Dene First Nations (AKFN) desire and need to preserve their spiritual and cultural values and connection to the land; and believes it is important to preserve the environment; to include water, flora and fauna, and importantly, the caribou herds. Uravan is committed to working with the AKFN in identifying and resolving specific areas of concern in a mutually beneficial way.

Uravan believes the exploration and mining industry is one of the most conscientious and diligent environmental group's operating in these remote areas not only because this is the philosophy that has evolved through experience and out of consciousness over time but because we want to be invited back.

Introduction

As the Public Record¹ indicates the following concerns were identified by the Parties² as potentially leading to adverse outcomes as a result of the above referenced project proposals:

- Potential impacts on caribou herds and associated impacts on wildlife and harvesting; and
- Potential impacts on the cultural values placed by Aboriginal communities and interested parties on the Upper Thelon River Basin³ ("UTRB");

Uravan has addressed these potential concerns throughout the Uravan EA process, as evidenced in the Public Record. Uravan's response is summarized below.

Other issues⁴ raised in the Submissions with respect to the Uravan EAs, such as the Crown's⁵ duty to consult, settlement of the Akaitcho Dene First Nations (AKFN) land claims, AKFN Interim Land Withdrawals (ILWs), conflicting/overlapping rights between First Nations and allegedly unresolved land management and resource planning initiatives by Government⁶ are commented on below under "Issues That Should be Excluded from Uravan's EA".

¹ The "Public Record" refers to the Review Boards website that can be accessed for viewing all communication with regard to the Uravan EAs

² The Parties are applicants granted "part status" by the Review Board with regard to Uravan EAs as identified in the Public Record

³ UTRB outline is illustrated on Figure 2, 3&4 attached

⁴ Details of the 'other issues' referred to in this paragraph can be viewed in the Public Record titled LKDFN Submission, YKDFN Submission, AKFN Treaty 8 Submission and Athabasca Dene Submission

⁵ "Crown" means Her Majesty in right of Canada

⁶ The allegedly unresolved land management initiatives by Government refers to the Upper Thelon Land and Resource Management Plan and the Thelon Game Sanctuary Management Plan



Potential Impacts

With regard to potential impacts on caribou herds; and potential impacts on the Aboriginal cultural values associated with the UTRB Uravan believes, as it has stated throughout the Uravan EA process, there is minimal to no cumulative impact as evidenced by:

1. The short duration and low impact nature of the proposed exploration operations as outlined in Uravan's Land Use Permit applications (MV2006C0008 and MV2007C0038) (the "Uravan LUPs") dated April 25, 2007 and Uravan EA Project Description dated December 19, 2007;
2. The exploration and environmental safeguards currently in place, to include, company operating standards, government requirements and established government and industry best management practices, which are fully outlined in Uravan's LUP application and Project Description and;
3. The large area of lands currently excluded from resource development within the UTRB and adjacent lands; withdrawn from disposition for the preservation of the environment; to include water, flora, fauna, and importantly, Aboriginal cultural values and the caribou herds.
4. From a historical perspective, Uravan and previous operators in the area (i.e. Boomerang property) have conducted low impact field operations over a number of years, the aggregate of which is graphically illustrated on the attached map (Figure 1). This work, consisting of geophysical surveys, core drilling and surface sampling programs carried out in 1976-1984, 1990-1992 and 1998; and most recently over the 2006 and 2007 summer field seasons on the same property or immediate area with approved LUPs. These operations resulted in no significant cumulative effects to the environment, the caribou herds and Aboriginal cultural values. Exploration activity in this remote region has taken place for many, many years resulting in no significant 'foot-print' left behind and minimal cumulative impacts.
5. When determining the impacts of caribou herds and caribou migration with respect the UTRB and the Boomerang project proposal, Uravan believes any impacts are minimal or non-existent based, not only on the discussions above (i.e. low impact of proposed operation and historical field observations), but also, in most cases, the caribou herds have completed their seasonal migration through the Boomerang and Thelon Basin area to reach summer or winter pastures farther north or south, either before or after Uravan's field operations take place in July and August, which is the optimum time of year for Uravan to conduct exploration in the Thelon Basin or UTRB.

Further, to put the regional location of Uravan's proposed exploration in perspective with regard to impacts on Aboriginal cultural values and impacts on caribou and caribou migration, in light of the preponderance of lands currently set aside to protect or preserve these interests, consider the following points. These points are also illustrated on Figures 2 and 3 attached.

1. Geographically, the UTRB (Figure 2) has been identified by the Akaitcho First Nations (AKFN) and the Review Board's "Report of Environmental Assessment" with respect to the UR Energy Screech Lake EA, as an important cultural landscape and an important migration route for caribou.
2. The UTRB geographically covers a large land mass encompassing parts of the Northwest Territories (NT) and Nunavut Territory (NU) totalling 85,010 sq km. The area covered by the UTRB in the NT totals 54,540 sq km. (Figure 2).
3. From the area covered by the UTRB in the NT, which totals 54,430 sq. km, 35,520 sq km or about 65% of the UTRB in the NT is withdrawn and currently excludes resource development, as evidenced by the areas covered by the Thelon Game Sanctuary, the Akaitcho First Nations Interim Land Withdrawals (ILW) and East Arm National Park and proposed expansion, leaving 18,910 sq Km or 35% of the UTRB available for potential mineral resource development (Figure 2).
4. In addition to the area within the UTRB that is currently withdrawn and excluded from resource development (i.e. 35,520 sq km), there are additional withdrawn lands contiguous to the UTRB, totalling 39,110 sq km, Therefore, the aggregate amount of withdrawn lands within and adjoining the UTRB amounts to 74,630 sq km (Figure 2).
5. The total area of the UTRB plus all withdrawn lands amounts to 93,540 sq km from which only 18,910 sq km or 20% are available for resources development in the NT (Figure 3)
6. Also, from the area of the UTRB remaining for resources development, 22,870 sq km is covered by the Thelon Geological Basin, the primary area of prospective exploration interest for Uravan; from which 3,428 sq km is covered by Uravan's

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Boomerang property and, out of this area, 775 sq km is covered by the Uravan LUP applications; the subject of the Uravan EA, which makes up about 1.5% of the UTRB.

Based on the forgoing analysis and in connection with Uravan's Boomerang project proposals, Uravan believes there is minimal to no impacts on caribou and caribou migration and on Aboriginal cultural values as these potential impacts are currently protected and preserved given the substantial area withdrawn from disposition, meaning that no surface of subsurface interests and developments can be established in the area within and directly adjacent to the UTRB (Figure 3).

Also, exploration activity in this remote region has taken place for many, many years resulting in no significant 'foot-print' left behind and no significant cumulative impacts (Figure 1). Historically, exploration projects have moved forward in these remote areas of the sub arctic 'barren lands' with the consistent vigilance of the land use regulators and operators to put in place operational procedures that have proven, over time and experience, to moderate or minimize impacts. Protection of the 'barren lands' has clearly been one of the highest priorities for the First Nations people, Government land use administrators and other stakeholders throughout the exploration history in this region. If the operational procedures are monitored and adjusted when required, in time potential changes may emerge, which could result in developing different operating guidelines. However, if one considers these concerns in the 'best light' of the Parties, the caribou herds and Aboriginal cultural values are protected given the preponderance of lands within and adjoining the UTRB currently set aside and withdrawn from any development (Figure 3).

Real-Time Monitoring of Exploration Activities

However, in consideration of Aboriginal concerns with respect to these potential impacts related directly to the Boomerang project proposals, Uravan would propose, as a means to mitigate these concerns, a proactive hands-on approach for assessing the impacts on caribou and Aboriginal cultural values. This proactive approach would entail the 'real time' monitoring of an exploration activities carried out by Uravan on the Boomerang North and South projects as defined in its LUP applications (MV2006C0008 and MV2007C0038). Uravan believes this is an approach that would provide the opportunity for concerned parties to observe real time exploration activity thereby forming a factual basis for addressing concerns. This activity could potentially lead to developing different or revised operational guidelines that would address and resolve potential impacts or concerns and could help sort out the level(s) of impacts that are the basis of concern. The monitoring process could involve individuals or a group of individuals from the concerned Aboriginal communities plus other government technical observers. Uravan believes this process has the potential to shed light on the concerns, confusion and possible misconceptions that surround exploration activity and the impacts they may have on this remote environment. Uravan believes visits to its operations together with regular monitoring of its activities will provide clarity around the issues and help resolve concerns.

Issues That Should be Excluded from Uravan's EA

The following paragraphs outline important political issues that Uravan believes fall outside of the Uravan EA. Uravan believes that these political issues should not be part of the Review Boards consideration with respect to the Boomerang project proposals. For the Review Board to allow these issues into the Uravan EA and require their resolution as a 'condition precedent' to approving Uravan's LUP would effectively sterilize Uravan's mineral rights for an unknown and unbounded amount of time. Uravan would incur a liability, and would seek relief, as a result.

1. The resolution of other political issues³ raised by certain Parties with respect to the Uravan EAs, such as the Crown's duty to consult, settlement of the AKFN land claims, the Interim Land Withdrawals (ILW) process, other conflicting/overlapping rights between the Dene First Nations and other allegedly unresolved land management and resource planning initiatives by Government⁵, should not be a condition precedent to Uravan obtaining LUP approval for the Boomerang project proposals. Although these issues are ostensibly important to some, Uravan has no authority or ability to mitigate, resolve or even participate in this process, and therefore, believe these issues fall outside the Uravan EA. Uravan believes these issues are much larger than the Uravan LUP applications and are matters best addressed and settled between Governments in a time frame they consider appropriate.
2. Uravan believes the land use issues between the AKFN and the lead Federal Government agency, Indian and Northern Affairs Canada (INAC), will not be resolved for a very long time. Given the alleged lack of adequate Crown consultation and accommodation as it relates to this region, Uravan has clearly been penalized and placed in the middle of issues it has no authority or ability to resolve or mitigate; not to mention, not being informed about and uninvited to participate in any negotiation to help mitigate or resolve the issue or concerns.
3. The resolution of the proposed Upper Thelon Land and Resource Management Plan, as initiated by INAC in December 2007 and the Thelon Game Sanctuary Management Plan, which arises from the Nunavut Land Claims Agreement (NLCA) ratified in 1993, are both long-range plans. Uravan is in favour of these initiatives provided they are a parallel process, taking into

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consideration existing land uses with regard to mineral right holders in the UTRB and they are negotiated openly with the participation of all stakeholders of the regions. However, by requiring these initiatives to be completed as a 'condition precedent' to approving LUP applications would effectively sterilize UraVan's mineral rights for an unknown and unbounded amount of time. Also, keep in mind that the Thelon Game Sanctuary, as illustrated on Figure 2 and 4 attached, was created in 1927, currently covers about 56,000 square kilometers and is withdrawn from disposition under the Federal *Territorial Lands Act*, meaning that no surface or subsurface interests and developments can be established in this area.

4. The AKFN stated⁷ that the only initiative of substance that has recently been resolved with respect to land claims and the UTRB is the signing into law by Canada in November 2007 the Akaitcho Interim Land Withdrawals (ILWs). On the other hand, the AKFN declared⁷ the ILWs areas chosen do not cover the core areas desired for protection of AKFN cultural and natural sensitivities in the UTRB area, specifically the area of the Thelon River valley between the confluence of the Thelon and Elk Rivers to the Thelon Game Sanctuary. UraVan believes this assertion is a prevalent AKFN position, as it does not take into consideration the fact that 80% of the Thelon River valley is already protected through several other disposition withdrawal mechanisms, similar to the existing large dispositional withdrawal of the lands within the UTRB. These disposition withdrawal mechanisms are discussed below and illustrated of Figure 3 and 4 attached.
- The total length of the Thelon River, from the headwaters at Lynx Lake, NT to the discharge point at Baker Lake, NU amounts to about 830 km (Figure 4)
 - The length of the Thelon River currently protected through various regulatory withdrawal areas (i.e. Thelon Game Sanctuary, Canadian Heritage River System, East Arm Park and expansion and AKFN ILWs) amounts to 672km or 81% of the total length of the Thelon River.
 - The only segment of the Thelon River that flows through the NT that is not protected and withdrawn in some manor is from the confluence of the Thelon and Elk Rivers to the Thelon Game Sanctuary amounting to 158 km, and covers the same area the AKFN felt they couldn't select with respect to their ILWs as it was previously covered by the Boomerang mineral rights.

Further, the AKFN assert⁷ they were effectively forced to select sub-marginal areas for their ILW due to pre-existing mineral claim interests in this area, such as the Boomerang North and South project areas, due to the "hot uranium" market. The AKFN further state that constraints were imposed due to third party interests that inhibited the selection of critical lands so the ILWs selected are not indicative of AKFN interest in the region⁸. UraVan wonders, given the expressed cultural importance placed on this area by the AKFN, how could this be, as it begs the question, where were the AKFN with regard to negotiating ILWs during the previous 22 years (1982 to 2004), a period of time when there was a very weak uranium market and the UTRB was essentially free of mineral claims? I guess one could say 'timing is everything' but UraVan doesn't agree that the process by which the AKFN used to choose their ILWs or the areas chosen should be considered in the Review Boards deliberation of the UraVan EAs.

Public Hearing

It is UraVan's position that no Public Hearing is needed or required in connection with UraVan EAs. UraVan believes the Public Record is clear and concise, particularly given the transfer of evidence from the UR Energy hearing and the additional evidence provided through the discourse of the UraVan EA process. UraVan believes a Public Hearing would not provide any additional information or bring further value to the concerns with respect to the UraVan EA process, and could potentially be counter productive, and most assuredly would be a misallocation of public and private funds and resources.

Conclusions

UraVan is unaware of any other jurisdiction in the world where an EA is required at the entry level exploration drilling stage. UraVan does not agree that an EA was necessary or required for either UraVan LUP application (MV2006C0008 and MV2007C0038) and considers the UraVan EA referral by the Review Board without merit given the low impact nature of these projects. In UraVan's view, no consideration was given by the Mackenzie Valley Land and Water Board (MVLWB) and the Review Board that UraVan and previous operators have conducted low impact field operations, most recently over the last two summer seasons (2006 and 2007), and previously in historical drilling programs carried out in 1976-1984, 1990-1992 and 1998 on the same property or immediate area with approved LUPs. The MVLWB *Preliminary Screening Report* of UraVan's LUP applications, as noted above, confirmed that the LUP applications

⁷ AKFN Treaty 8 Submission dated May 23, 2008 as evidenced in the Public Record

⁸ YKDFN Submission dated May 29, 2008 as evidenced in the Public Record

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Searching for the Metals of the Future

provided operating standards that established that the development proposal would not have a significant adverse impact on the environment.

Uravan believes the conclusions made by the Review Board, as documented in *Report of Environmental Assessment dated – Ur Energy Uranium Exploration Project May 2007*, were based largely on 'traditional knowledge' statements expressed by concerned Aboriginal groups and interested Parties without balancing these concerns with other land uses and competing land use rights based on evidence and documentation provided by others during the UR Energy Hearing. Also, the conclusions made by the Review Board were made despite UR Energy providing substantive mitigating operating procedures (as documented in their LUP application and EA material). The process of 'mitigation' is the only means that industry can make available to concerned parties given these complicated land use issues and competing rights, however, in Uravan's view, the Review Board rejected the UR Energy LUP application with little or no consideration for the 'mitigation' process or its mineral rights as granted by the *Territorial Lands Act* and *Canadian Mining Regulations*. Although Uravan understands and is sympathetic to the cultural values held by the AKFN in relation to the UTRB, Uravan also believes the Review Board needs to recognize and honour other land use rights that exist within this vast land area, which are not currently being recognized or balanced, especially given the large area of land set aside, withdrawn from mineral development within this region.

Uravan believes the land use issues currently being negotiated and/or debated between the AKFN and INAC, as referenced in paragraphs 1 – 4 above, will take at least a decades to resolve and potentially longer. If the Review Board requires the resolution of these issues to be a 'condition precedent' to approving the Uravan LUPs, resulting in a prohibition and impediment to accessing our Boomerang project mineral rights, and the AKFN, INAC and GNWT support these conclusions, then Uravan believes its mineral rights will be sterilized and made worthless through the decay of time and Uravan's ability to raise capital to pursue other opportunities.

Uravan believes if the Boomerang LUPs are not granted in a timely fashion, Uravan will incur a liability related to sunk costs on the Boomerang project, which currently amounts to about \$8 million dollars, and the lost opportunity cost of not moving forward to potential mineral discovery on this highly prospective project with a potential multi-million dollar valuation, and the potential punitive erosion of shareholder value and lost opportunity in the event that access to Uravan's mineral rights are continually prohibited.

Although Uravan understands the potential 'infringement of rights' the AKFN have asserted⁷ against INAC, rights-infringements will become legally poignant for Uravan if access to its mineral rights are continually prohibited based on these very 'infringements of rights'. As stated "..... the AKFN must conclude the Crown is in breach of its duty to consult...."⁷ and, in so doing, Uravan believes the Crown has allowed Uravan's Boomerang project mineral rights and tenure to become sterilized and made worthless. Uravan is in favour of relief while these issues are resolved, and supports the statement by the AKFN in these Submissions, "INAC has yet to provide any relief to mineral rights holders in the upper Thelon while it seeks to act....."⁷ Given this eventuality, Uravan believes, as supported by the AKFN⁷, compensation/accommodation is essential, commensurate with the erosion of value through time and the resulting lost opportunity.

To be clear, in the instance of Uravan, all stakeholders must realize Uravan is highly committed and heavily invested in the Thelon Basin and is not going anywhere and has no intent on abandoning its tenure, as Uravan believes in the potential of this project for the company, for all of the stakeholders, and for Canada.

Respectfully Submitted
Uravan Mineral Inc.

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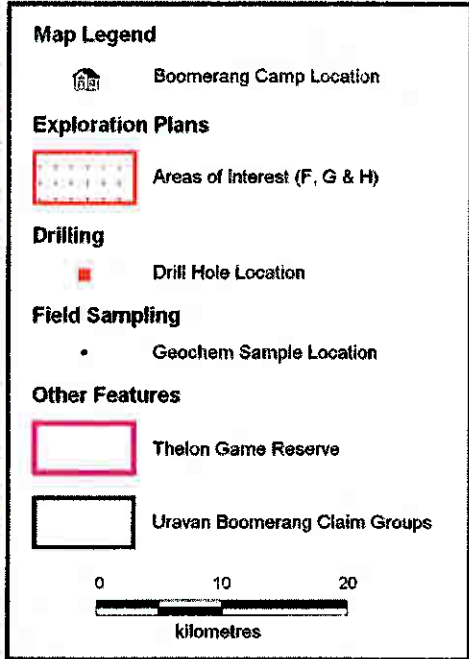
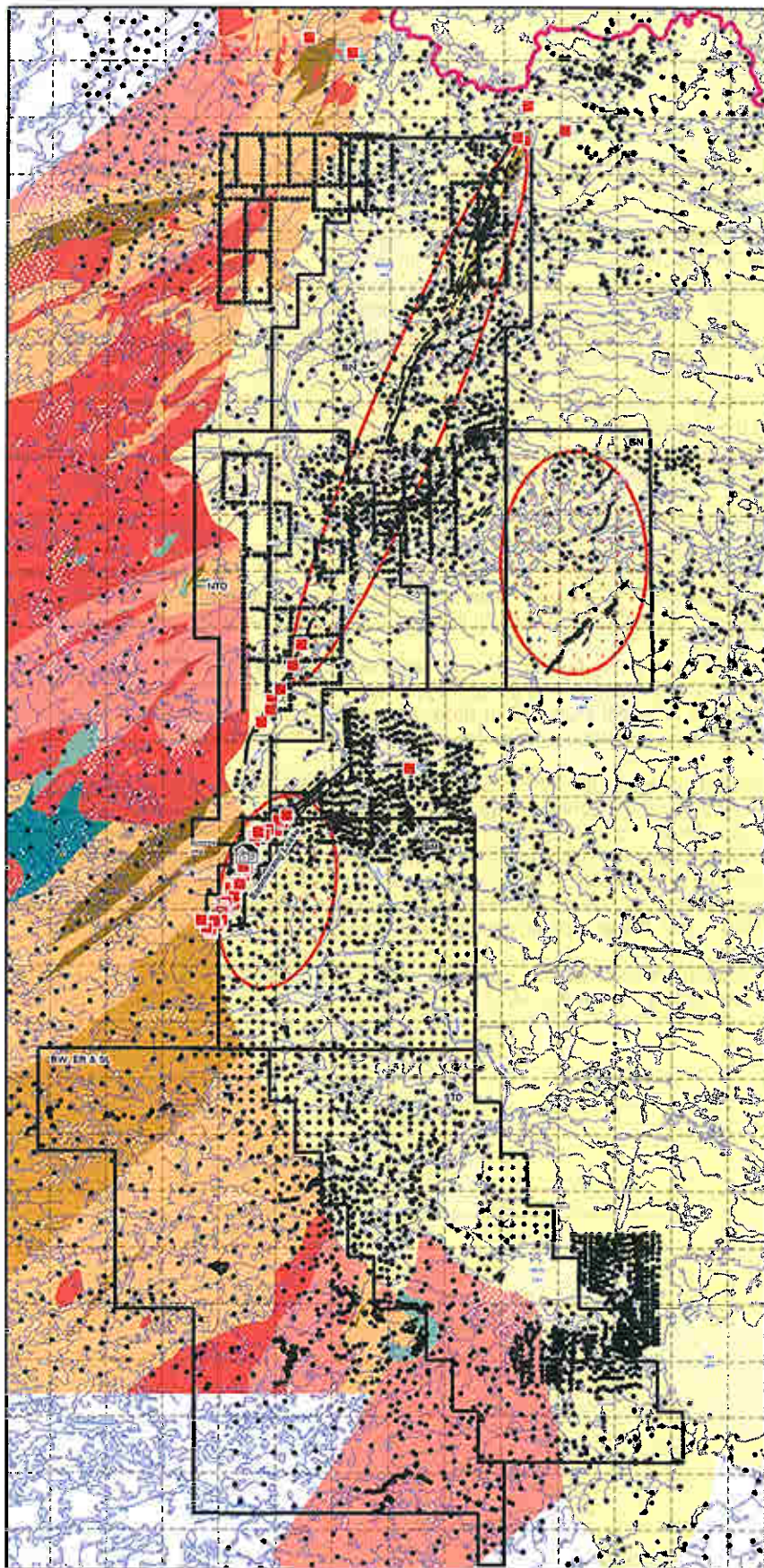


FIGURE 1

