



February 13 2008

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

Attention: Alistair MacDonald
Environmental Assessment Officer

RE: Comments to Draft Work Plan – EA 0708-02 and EA 0708-3 Boomerang North and South Projects

In connection with the Mackenzie Valley Environmental Impact Review Boards (“Review Board”) Draft Workplan for EA0708-003 and EA0708-002 – Boomerang Lake North and South Mineral Exploration Programs (respectively) dated January 8, 2008 (the “Workplan”); Uravan Minerals Inc. (“Uravan”) has the following comments and suggestions.

With reference to **Paragraph 4.2 Scope of Issues** of the Workplan, the Review Board determined that the scope of assessment for the Uravan EA0708-003 and EA0708-002 (the “Uravan EA’s”) would include, at minimum: (1) impacts on caribou herds and associated impacts on wildlife and harvesting; and (2) impacts of Uravan’s proposed exploration activity on the cultural value placed by aboriginal users on the Upper Thelon River Basin.

As the record indicates, during the UR Energy EA Public Hearing (the “Hearing”), these two issues, impacts on caribou and Aboriginal cultural values, were consistently raised as potentially leading to adverse outcomes as a result of UR Energy’s proposed exploration activity in the Upper Thelon River Basin. 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 made by concerned Aboriginal groups and individuals 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. Although Uravan understands and is sympathetic to the deep ecological and traditional knowledge held by the Akaitcho First Nations in relation to the Upper Thelon River Basin, Uravan believes there are other uses within this vast land area that are not being recognized or balanced by the Review Board. For instance, based on the ‘technical knowledge’ of Uravan and much of the geological and academic industries, the Thelon (geological) Basin is one of the last globally significant ancient sandstone basins that has the potential to host significant mineral resources.

Therefore, given the outcome of the UR Energy Hearing, Uravan believes that the Review Board will look at the Uravan EAs in the same light, resulting in the same conclusions unless a more creative and proactive approach is taken with the Uravan EAs. For the Review Board or any concerned party to fully understand and determine what the purported impacts really are would be difficult or near impossible without on-site investigation and allowing other relevant information into the review process, with respect to these types’ of remote exploration operations.

How can any information in connection with any potential impact in this remote area be known or understood without first monitoring the activity that purportedly results in an ‘impact’? Uravan’s believes its proposed exploration activities would have minimal impact and be non-cumulative based on the nature of the activity proposed and the operating procedures in place; as documented in Uravan’s Land Use Permit (LUP) applications (MV2006C0008 and MV2007C0038). Historically, the only way exploration projects moved forward on any public domain is for the regulators and operators to put in place operational procedures (which are already in place) that have been proven, over time and experience, to moderate or minimize impacts. If the operational procedures are monitored and adjusted when required, in time the ‘facts’ will emerge,

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which may result in developing different operating guidelines. However, in the case of the Upper Thelon River Basin, if the objective of the concerned parties is to stop all activity on the land, regardless of appropriate operational guidelines, then no amount of environmental or cultural assessment that Uravan or any other operator provides will be acceptable. Uravan believes this attitude hangs in the balance and creates unacceptable uncertainty. If no amount of operational best practices, procedures and guidelines are acceptable by the concerned parties then one has to ask; what are these Uravan EAs all about, i.e. a misallocation of intellectual capital?

Based on the foregoing and in connection with the Uravan EAs, Uravan would propose a proactive hands-on approach to assessing the 'Scope of Issues', i.e. impacts on caribou and Aboriginal cultural values, as identified in the Review Boards draft Workplan. This proactive approach would entail the 'real time' monitoring of an exploration drilling program 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 drilling operations and the impacts they may have on this frontier environment. Uravan believes by making available a 'live' exploration camp so that concerned parties, participating in a monitoring capacity, can experience 'real time' exploration activity will provide clarity around the issues.

The details on the timing of this proposal, the funding and the logistics of the monitoring process can be worked out, however, there first needs to be willingness by all concerned parties to become more proactive to resolve the issues with respect to their concerns. If there is no willingness to put facts around the issues and the agenda is to say no to any development in the Upper Thelon River Basin (i.e. a one land one use concept), then the mandate and authority of the Review Board under subsection 125(1) of the *Mackenzie Valley Resource Management Act (MVRMA)* to resolve or mitigate land use issues has to be questioned. Uravan will endeavour to work with all stakeholders to gain approval to access the land covered by its Boomerang claims; however, without clarity and willingness from concerned parties, no EA will resolve these land use issues and eventually will provoke unnecessary controversy.

Please give this proposal your highest consideration.

Respectfully Submitted
Uravan Mineral Inc.

Signed: "Larry Lahusen"
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