

April 8, 2008

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

Attention: Alistair MacDonald

**Environmental Assessment Officer** 

## RE: Scoping Questions – EA 0708-02 & EA 0708-3 Boomerang North and South Projects (the "Uravan EA)

In connection with the Mackenzie Valley Environmental Impact Review Board's (the "Review Board") letter dated March 13, 2008, requesting a response for:

- 1. The transfer ("Roll-over") of certain oral and written submissions related to UR Energy Screech Lake EA (EA 0607-003) into the Uravan EA (i.e. EA0708-003 and EA0708-002) and;
- 2. Certain "Scoping Question" as they pertain to the Uravan EA.

Uravan Minerals Inc. ("Uravan") has the following comments and suggestions, which only pertain to the Uravan EA (i.e. EA0708-003 and EA0708-002) and not related to other EAs that the Review Board has indentified in the above referenced letter.

With respect to the Roll-over of Public Registry (PR) submissions related to EA06070003 into the Uravan EA, Uravan would recommend, in addition to the 'draft' list submitted by the Review Board, transferring PR # Areva letter, Developer Letter, 14, 20, 22, 23, 27, 28,42,47,48 49,51-55,59, and 102. Uravan believes the Roll-over of these items, given the draft list submitted by the Review Board, would provide a better balance to the record.

With regard to the Scoping Questions: (1) Impacts on the Beverly and Ahiak Caribou herds; and (2) Impacts on the Aboriginal cultural values associated with the Upper Thelon River Basin ("UTRB") Uravan believes, as it has stated throughout this Uravan EA process, there is minimal to no cumulative impact with respect to these Scoping Questions as evidenced by:

- (a) The low impact nature of the proposed exploration operations as outlined in Uravan's Land Use Permit applications (MV2006C0008 and MV2007C0038) (the "Uravan LUP") and Project Description dated December 19, 2007;
- (b) 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 also outlined in Uravan's LUP application and Project Description and;
- (c) The preponderance of lands currently excluded from resource development within the UTRB and adjacent lands; withdrawn for the preservation of the environment; to include water, flora, fauna, and importantly, Aboriginal cultural values and the caribou herds.
- (d) From a historical perspective, Uravan and previous operators in the area (i.e. Boomerang property) have conducted low impact field operations, the aggregate of which is graphically illustrated on the attached map (Figure 1), consisting of core drilling and surface sampling programs carried out in 1976-1984, 1990-1992 and 1998; and most recently over the last two summer seasons in 2006 and 2007, on the same property or immediate area with approved LUPs resulting in no cumulative effects to the environment, the caribou and Aboriginal cultural values.



(e) When determining the impacts of caribou and caribou migration with respect the UTRB and Uravan's proposed exploration, 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 in light of the preponderance of lands currently set aside to protect or preserve these interests, consider the following:

- 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 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.
- 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 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 evidence, as it relates directly to the **Scoping Questions** outlined in the Review Board's letter referenced above, Uravan does not agree that the Uravan EAs are necessary or required on either LUP application, as described above, and considers the Uravan EA referral by the Review Board without merit, and which imposes an unrealistic and overly restrictive development constraint.

What Uravan would propose as an alternative way to assess 'scoping issues' related to Uravan's proposed operations, as outlined Uravan's LUP application and Project Description, would entail the 'real time' monitoring of exploration activities as discussed in Uravan's 'Comments to Draft Work Plan' dated February 13, 2008. 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.

Uravan honours the AKFN's desire and need to preserve their spiritual and cultural values and connection to the land; and believes in the preservation of the environment; to include water, flora and fauna, and importantly, the caribou herds. However, Uravan also believes there is a strong need to develop the hidden mineral resource value of these lands in a



manor that will have a minimal impact on the environments, but a large benefit to all stakeholders in the area and the people of Canada.

Respectfully Submitted Uravan Mineral Inc.

<u>Signed: "Larry Lahusen"</u> Larry Lahusen, CEO





