

October 28, 2008

## VIA ELECTRONIC MAIL

Nunavut Impact Review Board  
PO Box 1360  
Cambridge Bay, NU  
X0B 0C0

NIRB No.: 08EN037  
KIA No: KVL106B208  
INAC No.: N2008C0009  
NWB No.: 2BE-GAR0710

Attention: Stephanie Autut  
Executive Director, NIRB

### **RE: Part 5 Review Workshop – Uravan Minerals Inc (“Uravan”) Garry Lake project proposal**

Uravan is in receipt of your letter (copy attached) dated October 27, 2008 regarding Uravan's attendance at the November 5<sup>th</sup> – 7<sup>th</sup> public 'Scoping and Guideline Development Workshop' (the "Workshop") in connection with the Part 5 Review of the Garry Lake project proposal. With respect to Uravan's attendance at the Workshop please be advised that Uravan will have a person attending the Workshop to observe and take notes, however, this individual will not be attending in a capacity to provide direct company or project information with regard to the Garry Lake project proposal.

Immediately following the receipt of NIRB's Part 5 notice and scheduling of the Workshop dated October 8, 2008, Uravan contact Jeff Rusk (NIRB Director Technical Services) and requested the Workshop date of November 5<sup>th</sup> – 7<sup>th</sup> be moved slightly to either the prior or the following week as Uravan had prior commitments and could not attend based on the current Workshop schedule. Although Uravan considers this unfortunate that the scheduled Workshop date could not be changed, Uravan was assured by NIRB that its attendance was not required. Should this not be the case please advise.

The Garry Lake project proposal has been well document in the public record pursuant to Uravan's work proposal as outlined in its Land Use Permit (LUP) application. Further, Uravan's views with respect to the Garry Lake project impacts and cumulative impacts on wildlife and Inuit wildlife harvesting have been discussed in Uravan's June 5<sup>th</sup> response (copy attached) to the NIRB letter dated May 23, 2008 and Uravan's September 8<sup>th</sup> response (copy attached) to NIRB's screening decision. Should additional information be required for the Workshop please advise.

Uravan is keenly aware and is sensitive to the concerns expressed with respect to potential impacts that development may have on caribou migration and caribou calving areas. Uravan believes the current land use regulations and exploration best management practices have been established and tested over time to mitigate these concerns, particularly with respect to low impact entry level exploration drill program as proposed on the Garry Lake project. Uravan does not agree that a Part 5 Review is necessary or required for the Garry Lake project proposal and considers the Part 5 Review referral by the NIRB without merit. However, Uravan is committed to participate in the Part 5 Review process to the extent necessary or require by the Nunavut Land Claim Agreement and the EIS Guidelines once established by NIRB.

Regards,  
Uravan Minerals Inc

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Larry Lahusen, CEO

October 28, 2008

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PO Box 1360  
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Regards,  
Uravan Minerals Inc

**Signed: Larry Lahusen**  
Larry Lahusen, CEO

CC: Honorable Minister Chuck Strahl, Indian and Northern Affairs Canada



expertise to offer regarding the assessment and management of caribou and caribou calving grounds in the Project area.

As we move forward in the Part 5 Review of the Garry Lake project, it is the Board's request that the Proponent reconsider its initial indication that it would not participate in this public Scoping and Guideline Development Workshop. The NIRB is endeavoring to adhere to an expeditious review timeline and is confident that, with adequate cooperation by all parties, it could issue finalized EIS guidelines by mid-December, 2008. Following NIRB's acceptance of the Proponent's EIS submission, and assuming it is in conformity to the issued guidelines, the Board believes a Final Hearing could be scheduled approximately 90 days later, waiving the requirement of Technical Meetings and a Pre-Hearing Conference.

I respectfully request that you submit to the NIRB, in writing, notice as to whether or not you intend on having representation in attendance at the workshop. This indication should be submitted to the NIRB's Technical Advisor, Ryan Barry, at [rbarry@nirb.ca](mailto:rbarry@nirb.ca) as soon as possible.

Sincerely,

A handwritten signature in black ink, reading "Stephanie Autut". The signature is fluid and cursive, with the first name and last name clearly legible.

Stephanie Autut  
Executive Director, NIRB

Cc: Honourable Chuck Strahl ([strahl.c@parl.gc.ca](mailto:strahl.c@parl.gc.ca))  
Uravan Distribution List

September 8, 2008

## VIA ELECTRONIC MAIL

Honourable Minister Chuck Strahl  
Minister of Indian Affairs and Northern Development  
10 Wellington, 21<sup>st</sup> Floor  
Gatineau, QC

NIRB No.: 08EN037  
KIA No: KVL106B208  
INAC No.: N2008C0009  
NWB No.: 2BE-GAR0710

Email: [Strahl.C@parl.gc.ca](mailto:Strahl.C@parl.gc.ca)

### **RE: NIRB Screening Decision-Uravan Minerals Inc ("Uravan") Garry Lake Project Proposal**

Dear Honourable Minister Strahl:

Thank you for your letter of August 21, 2008, acknowledging Uravan's response to the Nunavut Impact Review Board's (NIRB) recommendations for further Review of Uravan's Garry Lake project proposal. I greatly appreciate the INAC Ministers office participating in this review process as I believe this will provide a better understanding and insight into these, not fully understood, land use issues.

One of Uravan's greatest concerns in working in this remote region is the delay and long approval time it now takes to gain access to mining claims to conduct entry level exploration programs, such as the Garry Lake project proposal. As discussed in previous correspondence, exploration in the Canadian 'barren-lands' or sub-arctic areas of NU and NT (the "Northern Territories") are significant undertakings that have to be planned and carried out during a limited field season.

Uravan's reality is that the capital markets that provide the funds to explore in these remote areas will not support companies experiencing lengthy land use debates and long approval times to conduct low impact entry level exploration programs. Unfortunately for Uravan and all the stakeholders of this region, the delays Uravan is now contending with have effectively frozen its assets and sterilized its sunk cost on the Garry Lake project amounting to about \$4 million dollars. Clearly, under these circumstances, Uravan and others cannot afford the additional capital risk to invest in Canada's Northern Territories. Given this knowledge prior to entry into the area; other jurisdictional choices would have been made.

I appreciate the involvement of the INAC Ministers office in these land use issues. Please give these and other comments your highest consideration with respect the Garry Lake project proposal.

Sincerely,

Uravan Minerals Inc

**Signed: "Larry Lahusen"**  
Larry Lahusen, CEO

CC: Mr. Ric Stryde, Policy Advisor, Honorable INAC Minister's Office

June 6, 2008

## VIA ELECTRONIC MAIL

Nunavut Impact Review Board  
PO Box 1360  
Cambridge Bay, NU  
X0B 0C0

NIRB No.: 08EN037  
KIA No: KVL106B208  
INAC No.: N2008C0009  
NWB No.: 2BE-GAR0710

Attention: Leslie Payette  
Manager of Environmental Administration

### **RE: Comments on the Nunavut Impact Review Board letter dated May 23, 2008 with respect to the Garry Lake project proposal**

Dear Parties:

The following is in response to a letter from the Nunavut Impact Review Board (NIRB) dated May 23, 2008 (Appendix A) in connection with Uravan Minerals Inc. ("Uravan") Land Use Permit (LUP) application on its Garry Lake project proposal.

Uravan submitted an LUP application dated January 25, 2008 pertaining to its Garry Lake project proposal to Indian and Northern Affairs Canada (INAC), Nunavut Territory (NU), which was also distributed to other Nunavut government land use regulators, such as the Nunavut Impact Review Board (NIRB), Kivalliq Inuit Association (KIA), Nunavut Planning Commission (NPC), Nunavut Water Board (NWB) and the Nunavut Planning Commission (NPC). Subsequently, the NPC completed its review of the Garry Lake LUP application, as required by the Keewatin Regional Land Use Plan (KRLUP) and the Nunavut Land Claims Agreement (NLCA), and on April 1, 2008 provided the NIRB with a positive conformity determination for the Garry Lake project proposal. Uravan's record indicates that on April 3, 2008 the NIRB commenced Screening of the Garry Lake project proposal, requiring all comments from Interested Parties by April 23, 2008. To Uravan's knowledge no further review or information on this project proposal was requested of Uravan by any party other than the normal clarifications. However, on May 15, 2008 (one day prior to the issuance of Uravan's LUP) the NIRB requested additional time from the INAC Minister's office for further review of the Garry Lake project proposal. Subsequently, on May 23, 2008 the NIRB requested, ".....input on a couple issues that, in the Board's mind, are prominently called into question with this current application". Based on the NIRB letter dated May 23, 2008, Uravan understands that the potential issues the NIRB requested further comment on are:

1. The proposed *Aberdeen Lake Special Management Area* as it may relate to the NIRB's propriety of making decisions in the proposed SMA without first having the proposed *Thelon Game Sanctuary Management plan* finalized and;
2. Potential cumulative impacts of these types of project proposals.

With respect to item one above, Uravan appreciates and supports the need for appropriate management of exploration activities in the caribou migration and caribou calving areas as outlined in NIRB's May 23<sup>rd</sup> letter. However, until such time as the proposed *Thelon Game Sanctuary Management Plan* or *Aberdeen Lake SMA* can be implemented (which can only be accomplished between governments and not Uravan) and in lieu of such a plan, Uravan supports the propriety of the NIRB, plus other land use administrators in the region and

operators, like Uravan, in making sound land use decisions and developing best management practices in support of preserving caribou environments and the integrity of the Beverly Caribou Herd. Uravan believes that all interested parties should keep in mind that the caribou migration and caribou calving areas, which covers a vast landscape within the subarctic 'barren lands', have experienced many, many years of exploration activities, similar to Uravan's Garry Lake project proposal, without any impact on the caribou herds, caribou calving and caribou habitats. Uravan believes the reason this excellent record has been accomplished is that there always has been in place: (1) strong government regulatory land management, (2) a set of well developed and implemented best management practices and (3) operators, like Uravan, that appreciate and support good land management practices with the intent on protecting the environment. Uravan wonders, if a land management plan for this region were in place, whether it would add any substantive value to what is currently known and practiced.

With respect to item two above, i.e. potential for cumulative impacts in this region, Uravan believes that the record speaks to this potential issue very clearly. As stated previously, exploration activity in this remote region has taken place for many, many years resulting in no 'foot-print' left behind and for the most part no cumulative impacts. The idea expressed by the NIRB, ".....impacts can arise from individually small but collectively significant actions that takes place over a period of time", Uravan believes is a well-meaning statement but is simple not true. It's not that this possibility of 'collective impacts' can't happen but is more about what has happened and importantly, the effort that has gone into not letting it happen. Protection of the 'barren lands' has clearly been one of the highest priorities for the Inuit people, Federal Government land use administrators and all other stakeholders throughout the exploration history in this region. All one has to do is read Uravan's LUP application on its Garry Lake project proposal to understand the care and detail that has evolved into these applications with the goal to maintain the pristine integrity of this environment and how much government regulators and organizations have involved all stakeholders and specialist in developing the rules and guidelines for operating on the 'barren lands' with the highest regard for the environment. Uravan believes the exploration and mining industry is one of the most 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 also because we want to be invited back.

Further to the discussion above, Uravan would ask all interested parties to step back and view Uravan's Garry Lake project proposal for what it really is. Uravan believes there is minimal to no cumulative impact to the environment or the caribou herds with regard to the Garry Lake project proposal as evidence by:

- The short duration and low impact nature of the proposed exploration operations as outlined in Uravan's Garry Lake LUP application and;
- 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 detailed in Uravan's Garry Lake LUP application.

However, if more monitoring or safety measures are required to protect the water, flora and fauna, to include caribou habitat, then I am certain Environment Canada, the Nunavut government land use administrators, other knowledgeable organizations and specialist and foremost the Inuit people can suggest further guidelines and recommendations to mitigate potential concerns. Uravan believes all stakeholders need to be proactive to solve land use issues and potential conflicts versus creating new ones, such as the question around the implementation of the *Thelon Game Sanctuary Management Plan and the Aberdeen SMA*, which Uravan has no part to play and believes its implementation is not germane to the Garry Lake project proposal.

Please give these comments your highest consideration with respect the Garry Lake project proposal.





Respectfully Submitted  
Uravan Minerals Inc

**Signed: "Larry Lahusen"**

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Larry Lahusen, CEO

CC: Honorable Minister Chuck Strahl, Indian and Northern Affairs Canada  
Honorable Minister John Baird, Environment Canada  
Mr. Ric Stryde, Policy Advisor, Honorable INAC Minister's Office

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*Larry Lahusen, CEO  
Uravan Minerals Inc.  
Office Phone: (403) 264-2630  
Fax: (403) 264-2629  
Direct Phone: (403) 607-5908  
E-mail: [llahusen@uravanminerals.com](mailto:llahusen@uravanminerals.com)*

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## **APPENDIX A**

### **Comments on the Uravan Minerals Inc. Garry Lake Project Proposal and the Thelon Game Sanctuary Management Plan**

***NIRB Letter dated May 23, 21008***



NIRB File No.: 08EN037  
KIA No.: KVL106B208  
INAC No.: N2008C0009  
NWB No.: 2BE-GAR0710

May 23, 2008

To: Uravan 08EN037 Distribution List

and: *Thelon Game Sanctuary Management Plan* Parties

and: Ian Fraser, Senior Geologist  
Uravan Minerals Inc.

Via email

**Re: Comments on the Uravan Minerals Inc. Garry Lake Project Proposal and the Thelon Game Sanctuary Management Plan**

Dear Parties:

Last week the Nunavut Impact Review Board (NIRB or Board) requested additional time from the Minister under section 12.4.5(b) of the Nunavut Land Claims Agreement (NLCA) to make a screening decision on Uravan Minerals Inc.'s Garry Lake Project Proposal. In making that decision, and the reason for the additional time requested, the Board would like your input on a couple of issues that, in the Board's mind, are prominently called into question with this current application.

First, the Board views the Thelon Game Sanctuary Management Plan (Thelon Plan) as a fundamental document that obviously guides activities in the region, and appears to have significance in NIRB determinations in this area. The updated Thelon Plan has not yet been finalized to date and the Special Management Areas (SMAs) identified in Appendix #2 have not yet been established. The specific SMA related to this particular file, referred to as the Aberdeen Lake SMA, is defined on page 42 of the Thelon Plan as follows:

The second Special Management Area proposed lies along the existing northeastern boundary of the Sanctuary and extends over the area between the Garry Lakes and the Aberdeen Lake area. This area, referred to as the Aberdeen Lake SMA, is locally recognized as a calving area for the Beverly Caribou Herd. The area extends southward to Marjorie Lake and the Dubwant River to encompass important crossing areas along the Thelon River. Like the Tyrrell Lake SMA in the southeast, this area is critical to protect a natural resource at the heart of the Sanctuary and its conservation mandate. The caribou herds of this region are a critical resource to both the Inuit and Dene people of the Thelon region and the success of maintaining those herds in healthy numbers is essential. Special considerations for the management of the area to the northeast of the existing Sanctuary must be consistent with the intent of the Management Plan for the Sanctuary while land use is administered locally through the appropriately designated regulatory body. (*Thelon Game Sanctuary Management Plan*)

The Board wonders about the propriety of making continued decisions in those areas without first having the Thelon Plan, and its SMAs, finalized with the input of parties like our sister Board, the Nunavut Wildlife Management Board (NWMB), and others identified in the Thelon Plan, such that the proper impact assessment considerations are before the Board and impact assessment decisions can be made. There is no doubt in the Board's mind that this plan gives relevant guidance to NIRB in that area.

Second, and related to the first concern, is the potential for cumulative impacts in that region. These impacts can arise from individually small but collectively significant actions that take place over a period of time. The Board is attaching a map illustrating current projects present in the area.

NIRB is also mindful of its decision options under the NLCA; these options are restricted to the language found in section 12.4.4 (a) through 12.4.4 (d), and one of these four decisions must be made by the NIRB for Uravan as follows:

- a) the proposal may be processed without a review under Part 5 or 6; NIRB may recommend specific terms and conditions to be attached to any approval, reflecting the primary objectives set out in Section 12.2.5;
- b) the proposal requires review under Part 5 or 6; NIRB shall identify particular issues or concerns which should be considered in such a review;
- c) the proposal is insufficiently developed to permit proper screening, and should be returned to the proponent for clarification; or
- d) the potential adverse impacts of the proposal are so unacceptable that it should be modified or abandoned.

The Board requests your views on which of the four decision options as listed above best lends itself to the significant issues raised above (the need to finalize the Thelon Plan, and cumulative effects) as these are prominent issues facing NIRB in this project proposal.

The project proposal itself, which we would like you to review again, can be obtained from NIRB's ftp site at:

<http://ftp.nirb.ca/SCREENINGS/ACTIVE%20SCREENINGS/08EN037-Uravan%20Minerals%20Inc/1-SCREENING/01-APPLICATION/>


The Board is copying interested Parties most affected by Uravan's project proposal with this letter, including the Parties identified within the Thelon Plan, as the importance of that Plan has been raised before the NIRB by the Beverly and Qamanirjuaq Caribou Management Board (BQCMB).

Please send your comments to the NIRB on or before **Monday, June 9, 2008** to the attention of NIRB's Manager of Environmental Administration Leslie Payette by email at [lpayette@nirb.ca](mailto:lpayette@nirb.ca) or via fax at **(867) 983-2594**.

Following the review of those comments, the Board will finalize its decision and communicate it to parties as soon as possible.

If you have any questions or concerns, feel free to contact NIRB's Director of Technical Services, Jeff Rusk at 867-983-4611 or [jrusk@nirb.ca](mailto:jrusk@nirb.ca).

Yours truly,

A handwritten signature in dark ink, appearing to read 'Stephanie Autut', is positioned above the printed name.

Stephanie Autut  
Executive Director  
Nunavut Impact Review Board

cc: Honourable Minister Chuck Strahl, Indian and Northern Affairs Canada  
Honourable Minister John Baird, Environment Canada

Attachment: Appendix A - Kivalliq Exploration Projects