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VIA ELECTRONIC MAIL

Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU
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NIRB No.: 08EN037
KIA No: KVL106B208
INAC No.: N2008C0009
NWB No.: 2BE-GAR0710

Attention: Ryan Barry
Director, Technical Services

RE: Garry Lake Project EIS Guideline Review and Cost Estimate

Recently, Uravan Mineral Inc (Uravan) requested SRK Consulting (Canada) Inc. (SRK) to provide Uravan with a detailed review and cost estimate of the Guidelines (i.e. *Final Guidelines For The Preparation of An Environmental Impact Statement For Uravan Mineral Inc's Garry Lake Project*). The purpose of this review was to provide Uravan with an understanding of the scope and cost for completing the Garry Lake EIS in the manner outlined in the Guidelines.

SRK is an independent, international consulting firm, offering services from exploration through feasibility, mines planning, and production closure.

SRK's review and cost estimate makes, among other things, the following conclusions:

Based on our review of the document, the *Final Guidelines For The Preparation Of An Environmental Impact Statement For Uravan Mineral Inc.'s Garry Lake Project* (NIRB file No. 08EN037), February, 2009, are not commensurate with the potential for environmental and social impacts, the significance of those impacts and the spatial and temporal extent of the anticipated impacts of the Garry Lake exploration project. As a result, it is our opinion that the requirements as defined in the Final Guidelines are unrealistically onerous and significantly surpass the level of assessment required of a project of the type and size being proposed.

In addition, we do not believe that there is sufficient data of an adequate quality available in the public domain to address the requirements of the Final Guidelines as they are currently written and that completion of the ESIA as outlined in Option I, using existing publically available data, would not guarantee an environmental impact statement that would be robust enough to satisfy the NIRB guidelines. Therefore, SRK does not recommend Uravan proceed with Option I.

Although Option II would provide a very comprehensive document in accordance with all aspects of the Final Guidelines, the cost and time required to complete this option are not reasonable for the scale and nature of the proposed program. Therefore, SRK does not recommend that Uravan proceed with Option II.

Commensurate with the conclusions stated about, SRK produced two cost estimates (Option I and II) to complete the Garry Lake project EIS based on separate assumptions:

Cost Estimate I

Cost Estimate I assumes that the NIRB's expectation that adequate data and information relevant to the regional and local study area exists in the public domain and that this information is of sufficient quality to be scientifically defensible and therefore available for inclusion in the Garry Lake Project ESIA.

Given the above assumptions are correct, completion of the ESIA for the Garry Lake Project as per the existing guidelines is estimated to cost approximately \$370,000 and could likely be completed within a nine to twelve month timeframe which must include a summer season. A detailed breakdown of the cost estimate is provided in Appendix A.

Uravan Minerals Inc.

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However, completion of the ESIA with a reliance on the availability of existing data and information would likely result in aspects of the Final Guideline requirements being addressed within the final document to varying levels of detail and completeness. As a result, it is unclear how the NIRB reviewers or the public would review and react to those sections of the ESIA which, because of a lack of existing relevant data, will not be complete when compared against the Final Guideline requirements. There exists a very real possibility that, because of the lack of quality of the existing data and information, the reviewers of the ESIA will judge the data insufficient and request the proponent to augment that data through the acquisition of additional information to support the ESIA conclusions.

In addition, page 26 of the Final Guidelines requires the proponent to *comment on how representative the (existing) data are, clearly separate factual lines of evidence from interference, and state any limitations on the inferences or conclusions that can be drawn from them*. It is not possible to address this requirement in any meaningful manner, as access to the information necessary to arrive at any meaningful conclusion (i.e. information on study design, data collection/analysis methods, QA/QC factors and other relevant information) is not likely to be included in the existing reports.

Cost Estimate II

Cost estimate II assumes that all of the baseline data and information required to complete the ESIA in accordance with the Guidelines is not currently available in the public registry or that the data and information is available cannot be sourced in the quantity or quality necessary to conduct a creditable assessment of the potential impacts in a manner that would satisfy the NIRB's February, 2009 Final Guideline requirements.

Under this scenario a significant number of new baseline investigations will be required. The total cost estimate to complete the ESIA under this scenario is estimated to be a minimum of \$5,000,000 and would require a minimum of three years to complete. Further details on the various investigations/surveys required are discussed in Appendix B.

A copy of the "Garry Lake Environmental Impact Statement Guideline Review and Cost Estimate" prepared by SRK is attached for your reference.

Based on the SRK review of the Guidelines, the cost and time to complete an EIS on the Garry Lake project, robust enough to provide meaningful conclusions is prohibitive given the low impact entry-level exploration program proposed in the Garry Lake LUP application. Consequently, Uravan is uncertain how to proceed should the NIRB insist that an EIS submission is required as a precondition for determining approval of the Garry Lake LUP application. Hence, Uravan needs some guidance from the NIRB on their position in light of the SRK "Garry Lake Project – Environmental Impact Statement Guideline Review and Cost Estimate".

Regards,
Uravan Minerals Inc

Larry Lahusen, CEO

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