

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

10 April 2006

Ms. Meg McCluskie
Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor, 4910 - 50th Avenue
P.O. Box 2130
Yellowknife NT X1A 2P6

Mackenzie Valley Land
& Water Board

File

APR 25 2006

Application # MV2006C0008

Copied To mml Reg.

Dear Ms. McCluskie:

Land Use Permit Application MV2006C0008

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on Uravan Minerals Inc.'s application for Land Use Permit MV2006C0008 regarding their proposal to conduct mineral exploration activity in the area of Boomerang Lake, NWT.

The role of the BQCMB is to work cooperatively to promote the wise use of caribou to prevent population decline and safeguard the needs of traditional hunters and others. Some background information on the BQCMB and Beverly caribou is provided in Attachment 1, and additional information is available on the BQCMB website (www.arctic-caribou.com).

The BQCMB is concerned with the amount of mineral exploration underway and proposed across the range of the Beverly caribou herd, including activities in the upper Thelon watershed. We are concerned with increasing activity in this area particularly because it is on the primary movement corridor used by the herd during their spring migration to the calving ground (see www.arctic-caribou.com/parttwo/pdf/bshi.pdf). A brief outline of our concerns is provided on Attachment 2, which is similar to materials prepared in response to last year's application by Ur-Energy to conduct mineral exploration in this area.

An important change has occurred since the review of Ur-Energy's application, however. The Department of Indian Affairs and Northern Development made a commitment to the Akaitcho Dene First Nations in November 2005 that no further prospecting permits would be issued in areas undergoing negotiations for interim land withdrawal. We understood the intent of this commitment as being to provide the Akaitcho with the opportunity to identify areas they wish to protect from industrial development, before further development proceeds and that opportunity is lost.

Secretariat Address: P.O. Box 629 Stonewall MB ROC 2Z0
Tel: (204) 467-2438 e-mail: rossthompson@mts.net
website: www.arctic-caribou.com

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

Approval of the permit application by Uravan to conduct mineral exploration in the Boomerang Lake area in 2006 - and any similar proposals for work in the upper Thelon watershed - would increase the amount of exploration activity in the area. This would also increase the expectation by Uravan and other mineral exploration companies that exploration and development will proceed in this area with no additional restrictions. Both of these results are inconsistent with the commitment made to the Akaitcho by the federal government. If Uravan's permit application is approved, it will signal to the Akaitcho and others that the MVLWB does not honour the intent of INAC's commitment, and that the two agencies are acting at cross-purposes.

For the reasons outlined above and in Attachment 2, we recommend that Uravan's application to conduct work in the Boomerang Lake area in 2006 be denied.

Sincerely,



Leslie Wakelyn
BQCMB Biologist

cc: Steve Ellis, Treaty 8 Tribal Council
Monte Hummel, World Wildlife Fund Canada

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Attachment 1:

Background Information

- The Beverly and Qamanirjuaq Caribou Management Board and Beverly Caribou

What is the Beverly and Qamanirjuaq Caribou Management Board (BQCMB)?

The BQCMB was established in 1982 to co-ordinate the management of the Beverly and Qamanirjuaq caribou herds. The BQCMB operates under an agreement between the governments of the Northwest Territories (NWT), Nunavut, Saskatchewan, Manitoba, and Canada. Up to ten members represent communities across the Beverly and Qamanirjuaq caribou ranges, and five members represent governments. Membership includes representatives from the South Slave region of the NWT, the Kivalliq region of Nunavut, northern Saskatchewan, and northern Manitoba.

BQCMB Mission: To ensure the long-term conservation of the Beverly and Qamanirjuaq caribou herds for Aboriginal communities who wish to maintain a lifestyle that includes the use of caribou, as well as for all Canadians and people of other nations.

BQCMB Mandate: To advise governments and caribou range communities on ways to protect the Beverly and Qamanirjuaq caribou herds and their ranges. This includes development of a Caribou Management Plan which outlines principles, goals and priorities for caribou conservation, as well as ways in which the BQCMB will work co-operatively with governments, communities and other organizations to incorporate the scientific work of biologists and the traditional knowledge of Aboriginal peoples during development of recommendations.

The BQCMB has more than 20 years of experience tracking developments on the Beverly and Qamanirjuaq caribou ranges, including participation in environmental assessments of proposed uranium mines, and reporting on the impacts of uranium mining. The BQCMB has produced various tools for assessing the potential impacts of developments on the caribou ranges, and has developed a clear position on action needed to protect the caribou herds in this era of increasing northern development.

A BQCMB position paper, which is available on the Board's website (www.arctic-caribou.com), describes action needed to protect Beverly and Qamanirjuaq caribou and caribou range. This paper provides five key recommendations, and describes various issues and principles used to develop these recommendations.

The Beverly Caribou Herd

Herd Size and Status

The number of caribou in the Beverly herd has been estimated by government biologists numerous times over the past 50 years. However, caribou counts on the spring and winter ranges from the late 1940s to the 1960s did not provide adequate information for determining whether the herd was increasing or decreasing.

Calving ground surveys from 1971 to 1980 suggested that the herd was declining. Total herd size was estimated to be about 105,000 in 1980. Biologists believed that the herd would soon be in trouble if the number of animals harvested was not reduced. However, many Inuit hunters believed that the herd was actually increasing, or that it was using different parts of the range, and did not agree that hunting was a problem.

Surveys of Beverly caribou conducted in the 1980s indicated increasing herd size. Population estimates were 125,000 in 1982 and 190,000 in 1988. The 1994 population survey of the Beverly herd indicated that the trend had continued, resulting in a herd size of 276,000 caribou.

However, recent surveys of four other NWT barren-ground caribou herds have shown that these herds are declining, so the Beverly herd may also be decreasing. The next population survey of the Beverly herd is planned for 2007.

Range Location and Use

A series of maps showing seasonal ranges of Beverly caribou are available on the BQCMB website (www.arctic-caribou.com/parttwo/mapatlas.html). These maps were produced by the BQCMB based on information obtained during government surveys from 1940 to 1995, and can be used to identify the geographic relationship of the upper Thelon watershed to seasonal range use by Beverly caribou.

Beverly caribou have migrated across the northern Canadian landscape for thousands of years, traveling as far as 2000 kilometres each year. The range used by this herd over the past 60 years extends across a huge and diverse area, from the boreal forests of Saskatchewan, across the subarctic taiga of the NWT, to the arctic tundra of west-central Nunavut (www.arctic-caribou.com/parttwo/pdf/bqtotca.pdf).

The total range used by the herd during this period extends almost 1000 kilometres from south to north. In some years, however, the caribou have remained north of the historic forested winter range in northern Saskatchewan and Manitoba. Because the herd overlaps with Bathurst caribou on the west and the Qamanirjuaq herd on the east, it is difficult to determine the western and eastern limits of the Beverly range. However, Beverly caribou range is at least 600 kilometres from west to east.

The Beverly herd migrates northward each spring to the calving grounds, and then travels back toward the more southerly winter range in July, and again each fall. Every

year Beverly caribou return to the same general area for calving, although not to the same specific location. Consequently, the Beverly herd's traditional calving grounds (the total area known to be used for calving over many years) are much larger than the area used in any particular year. The Beverly herd's calving grounds (approximately 38,400 sq. km.) extend from the area around the lower Thelon River and Beverly and Aberdeen lakes, north towards the Back River and Pelly and Garry lakes, and have been described by surveys in 23 years between 1957 and 1994. Calving ground surveys found that most Beverly caribou calved in the southeastern half of the traditional calving grounds between 1957 and 1974, but that calving occurred primarily in the northern portion of the calving ground since 1980. This is why the entire traditional calving grounds, not just the area used for calving in one year, are important to the herd over the long-term.

Unlike all other mainland barren-ground caribou herds, which spend part of their annual cycle in coastal areas, Beverly caribou remain inland year-round. The landscape through which the Beverly herd travels can be characterized as primarily wilderness, including hundreds of wild rivers and lakes, and one of the largest protected natural areas in North America, the Thelon Wildlife Sanctuary. Human habitation on the range is limited to 10 small communities around the fringes of the range, and five others nearby.

The Value of the Caribou Herds

Beverly and Qamanirjuaq caribou herds are an extremely valuable resource for four territorial and provincial governments and the federal government, and for about 20 communities. The Beverly herd is harvested by Dene, Metis, Cree, Inuit and non-aboriginal people from about a dozen communities in NWT, Nunavut, Saskatchewan and Manitoba.

The minimum gross economic value of Beverly and Qamanirjuaq caribou harvested in a single year is about \$17 million. The cultural and spiritual value of the herds is immense.

Attachment 2:

Mineral Exploration in the Upper Thelon Watershed - Issues for Beverly Caribou and the Beverly and Qamanirjuaq Caribou Management Board

Why is the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) concerned about applications for mineral exploration in the upper Thelon watershed? The six main issues concerning these permit applications that directly relate to the mandate of the BQCMB are outlined briefly below.

1. Potential impacts of exploration on Beverly caribou and caribou habitat. The Boomerang Lake area is located on key habitat for Beverly caribou, including their primary spring migration corridor and key water crossings (see maps at www.arctic-caribou.com/parttwo/mapatlas.html). Potential impacts include the direct effects of exploration on caribou, such as disturbance from aircraft, and significant habitat loss that may result from avoidance of exploration activities near important water crossings.
2. Potential impacts of uranium mining and other development activities on the Beverly caribou herd and caribou range, including downstream effects on the integrity of the Thelon watershed. The effects on Beverly caribou include impacts from existing and abandoned uranium mines in northern Saskatchewan. This concern reflects experience gained by the BQCMB in the review of uranium mine proposals near Baker Lake and in northern Saskatchewan, and concerns about abandoned and operating uranium mines in northern Saskatchewan.
3. The need for an assessment of the cumulative effects of increasing levels of exploration and development across the annual range of Beverly caribou. This assessment must take into account accumulating effects of activities encountered by Beverly caribou within and between years, from the mines and roads on the winter range in Saskatchewan to increasing levels of exploration on the calving and post-calving areas in Nunavut. An upper threshold of activity that will allow the Beverly caribou herd to continue to thrive should be identified.
4. The precedent that will be set by the decision made about this permit application, particularly in light of the federal government's commitment to the Akaitcho to not issue prospecting permits in 2006 in this area. The inevitability of increased exploration and development in the upper Thelon watershed, should this and other permits be granted in this area in 2006, would be of great concern to the BQCMB. An additional concern would be subsequent pressure to open up the Thelon Wildlife Sanctuary to development that would potentially result from successful exploration in the upper Thelon watershed. This would be contrary to recommendations made by the Akaitcho Dene and Inuit of Baker Lake regarding the Thelon Sanctuary Management Plan and establishment of Special Management Areas.

5. The consequences of permitting exploration in the upper Thelon watershed on ongoing plans and processes for establishing protected areas in this region. Our Board supports the "conservation first" principle, which means that neither exploration nor development would be permitted in areas that have been identified for protection or are under negotiation by the Akaitcho, including areas for which boundaries are currently being selected.
6. The detrimental effect that increasing exploration and development across the annual range of the Beverly caribou herd may have on the ability of the Akaitcho Dene and the Inuit of Baker Lake to maintain a lifestyle that includes the use of caribou. This issue is fundamental to the mandate of the BQCMB, results from all issues outlined above and is of increasing concern.



Athabasca Denesuliné Negotiation Team

Mackenzie Valley Land
& Water Board

April 6, 2006

Mackenzie Valley Land and Water Board
Box 2130, 7th Floor - 4910 50th Avenue
Yellowknife, NT
X1A 2P6

File _____

APR 18 2006

Application # MV2006C0008

Copied To mm/Reg.

RE: Land Use Permit Application: Uravan Minerals Inc.

Dear Sir/Madam,

Please accept the Athabasca Denesuline comments regarding the 2006 Uravan Minerals Inc. application to MVLWB for a land use permit for mineral explorations on the "Boomerang property" south of the Thelon Game Sanctuary. We are grateful that the proponent forwarded us a copy of their application package since we did not receive notification of the proposed development from the MVLWB. Under the terms of our Interim Measures Agreement, the MVLWB should have notified us of this application.

Our response is submitted without prejudice to our ongoing negotiations with Canada, nor should it be construed as support for the current NWT land and water management regime.

The Athabasca Denesuline territory parallels the range of the caribou herds that our people have relied upon for more than 8,000 years; including the south-eastern part of the Northwest Territories. While our reserves and present-day communities are located in Northern Saskatchewan, hunting, trapping and other cultural use areas are located north of the 60th parallel.

Artificial political, treaty and administrative boundaries continue to be drawn through Athabasca Denesuline traditional territory. We do not regard these boundaries as having diminished our Aboriginal and Treaty rights in the area, including resource harvesting and the maintenance of our cultural resources and identity on our ancestral lands. We continue to exercise these rights as we have in the past.

The proposed exploration activities intersect Athabasca Denesuline traditional use areas and wildlife habitats important to them. The attached maps illustrate these intersections and are summarised below.

c/o Prince Albert Grand Council

Suite 206, 1004 - 1st Avenue West, Prince Albert, Sask. S6V 4Y4

Email: rrobillard@pagc.sk.ca or rgood@pagc.sk.ca

Mailing Address: P.O. Box 2350, Prince Albert, Sask. S6V 6Z1

Phone: 306-922-7612 or 306-922-7613 Fax: 306-763-2973

1

The area to be explored (Mineral Claims - BN, BM, NTD, STB and Mineral Lease – Boomerang) encompasses at least 55 Archaeological sites, numerous cabins/overnight sites, travel routes and trap lines as places with Denesuline names. The primary Athabasca Denesuline community affected is Fond du Lac.

In terms of possible wildlife impacts the study area includes a number of caribou crossings as well as spring, summer, fall rut and winter caribou habitats. In addition the area is important muskoxen habitat.

Given the level of traditional activity within the proposed exploration areas and possible effects on wildlife, the Athabasca Denesuline met with representatives of Uravan Minerals Inc. on March 1, 2006 to discuss their proposed operations and future plans, our concerns, and possible mitigation options. We expect that terms and conditions to address our concerns will form a component of any permit or licence issued. All activities should be conducted so that there is little or no impact on traditional land use activities, overnight sites, archaeological sites and artefacts.

When performing exploration activities, the company should be aware that they may encounter unknown or unrecorded archaeological sites and Aboriginal artefacts. Should the proponent encounter any unrecorded sites they should stop work in that area and contact this office. Given that the ground may be snow covered during portions of the exploration period, extra attention will need to be focused on the identification of potential sites.

The yearly migration of the Beverly-Qamanirjuaq caribou herd is integral to the Athabasca Denesuline economic, social and cultural identity. Any potential disturbance to the caribou is potential risk to the Athabasca Denesuline identity. Several water crossings overlap with the proposed development area. Water crossings are very sensitive to developments because they may be areas where large numbers of caribou move through. While the proposed activities do not fall within identified calving grounds or post calving grounds it is important to note that the most recent Beverly-Qamanirjuaq Caribou Management Board position paper¹ indicates that the mapped caribou ranges are a rough guide to where they calve. The caribou do use other areas, which vary from year to year and the management of development activities in the vicinity of the caribou calving and post-calving grounds must account for these yearly variations.

The application notes that this stage of the exploration program will have no long term socio-economic impact. Both short term and long-term economic benefits may be possible, but were unclear in the proposal, and not guaranteed. The proponent should explore possible benefit opportunities with the Athabasca Denesuline.

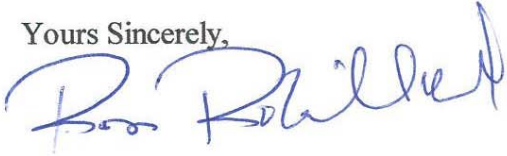
Finally while we think that the majority of our concerns can be addressed at this stage of development, we have a fundamental Treaty and Aboriginal Rights interest in the Thelon Basin and believe that a broader management framework for the whole of the basin,

¹ Beverly and Qamanirjuaq Caribou Management Board. September 2004. Protecting Calving Grounds, Post-Calving Areas and Other Important Habitats for Beverly and Qamanirjuaq Caribou. A Position Paper.

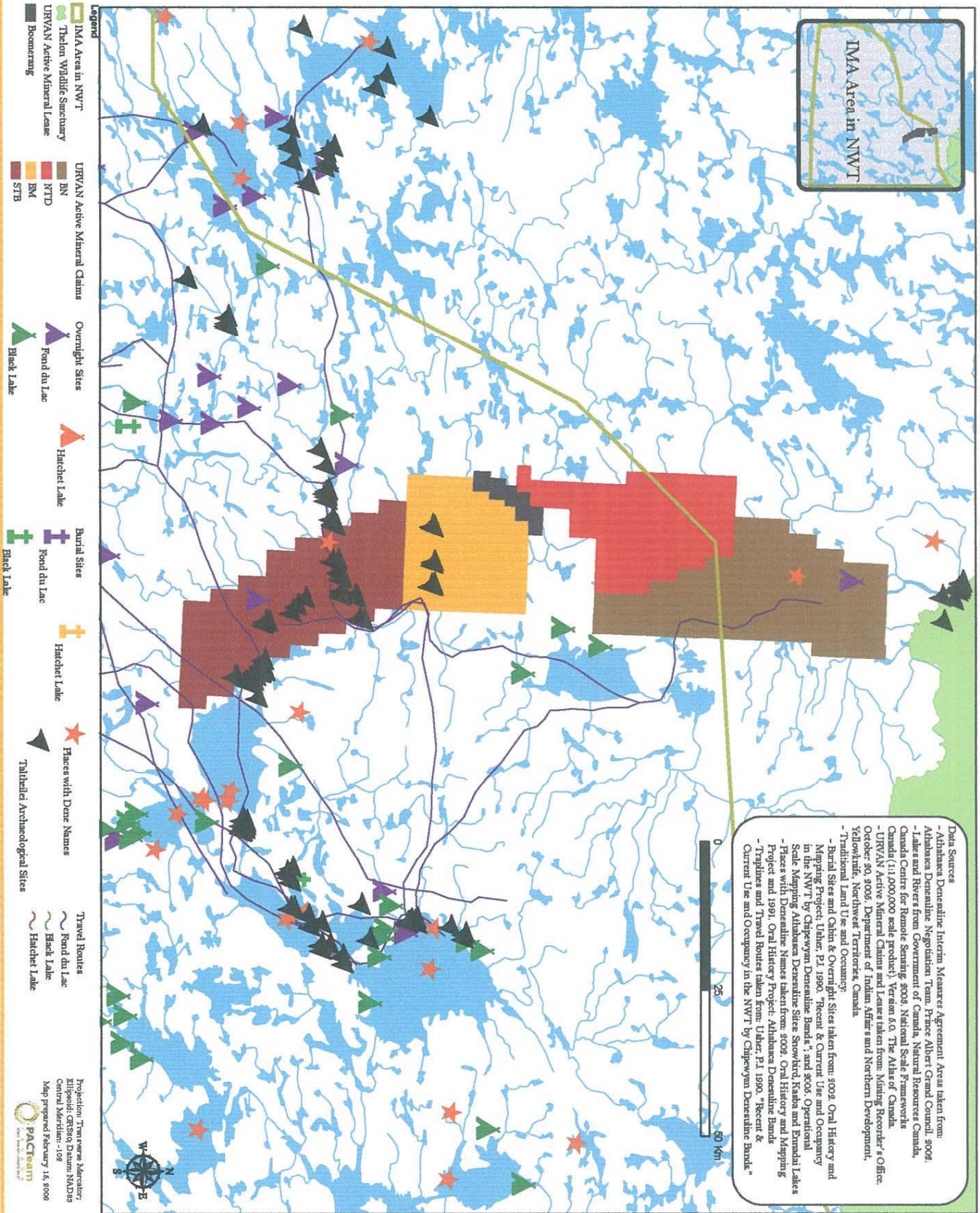
including protected area regimes, is necessary to balance all of the areas interests. Any such management plan must be developed in cooperation with the Athabasca Denesuline before any industrial level developments are considered for approval.

We would encourage a response from MVLWB to show if / how our comments are incorporated into their application process.

Yours Sincerely,

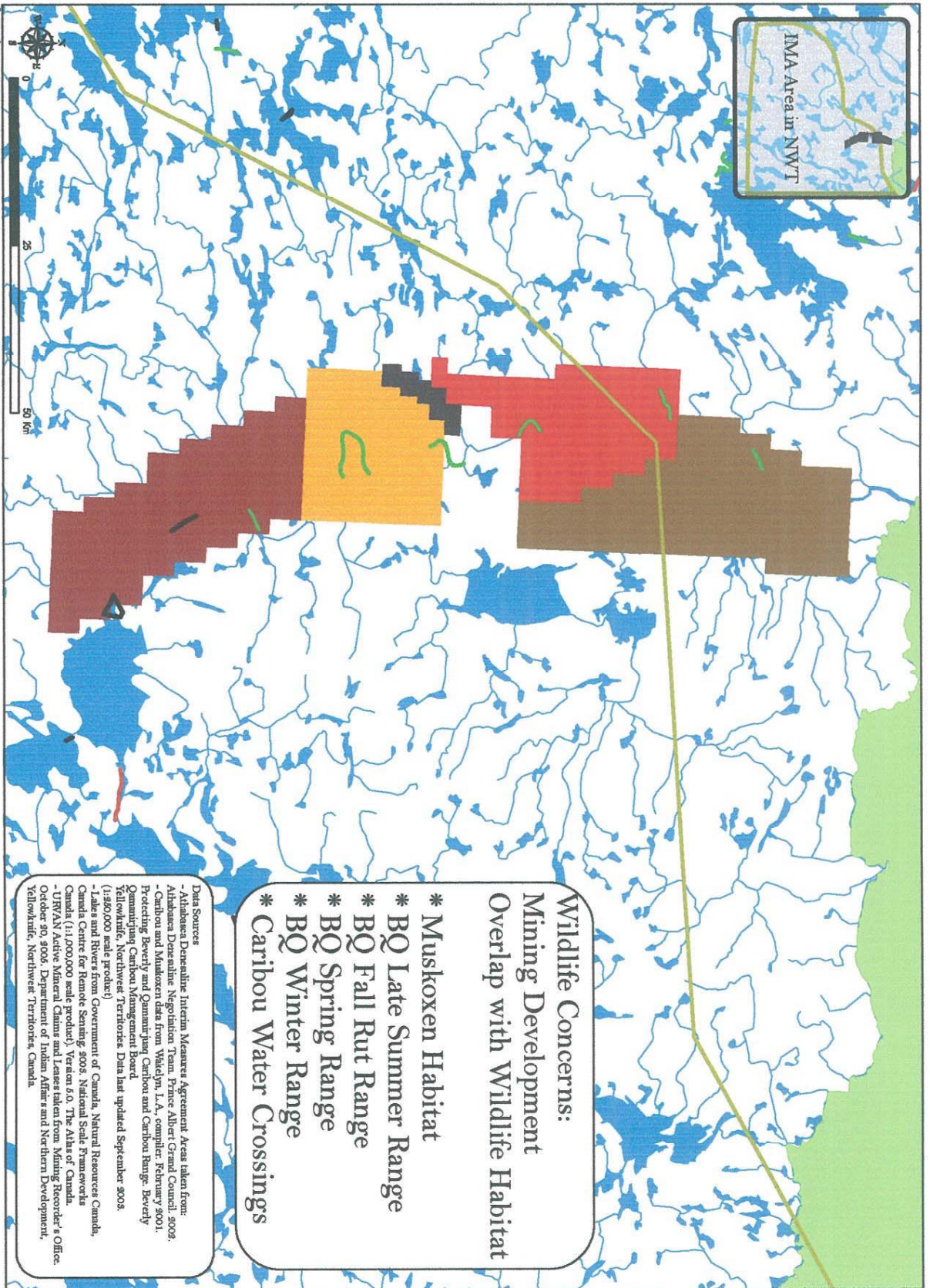
A handwritten signature in blue ink, appearing to read "Ron Robillard". The signature is fluid and cursive, with the first name "Ron" and last name "Robillard" clearly distinguishable.

Ron Robillard
ADNT Chief Negotiator, Prince Albert Grand Council



Wildlife Concerns with the URVAN Minerals Inc. Mineral Claims and Leases in the Athabasca Denesuline IMA Area in NWT

February 15, 2006





INITIATIVE
BOREALE
CANADIENNE

CANADIAN
BOREAL
INITIATIVE

10 April 2006

Ms Meg McCluskie
MacKenzie Valley Land and Water Board
P.O. Box 2130
Yellowknife, NT X1A 2P6

Re: Land Use Permit MV-2006-C0008

Dear Ms McCluskie,

The Canadian Boreal Initiative (CBI) is an independent organization that works with diverse organizations to promote conservation and sustainability for communities and ecosystems in Canada's boreal region. CBI has established active partnerships in several regions within the NWT, including the Akaitcho.

In accordance with the Boreal Framework, CBI recognizes that respect for Aboriginal rights and title is a starting point for sustainability. Our work includes support for protected areas that are designated in a way that respects both ecological realities and Aboriginal and treaty rights. We also promote local and regional planning, grounded in community processes and based on research that blends traditional and local knowledge with 'western' science. To this end, we are currently working in partnership with Akaitcho First Nations towards the mutual goal of developing and promoting large, ecologically and culturally appropriate boundaries for proposed protected areas within Akaitcho territory, and supporting Akaitcho capacity for conservation and the management of their lands.

In this context, and in response to a specific request from the Akaitcho First Nations, we have reviewed Land Use Permit MV2006C0008 concerning proposed mineral exploration by Uluavut Minerals at Boomerang Lake, NWT, and wish to offer the following comments:

- The proposed activities are out of sync with the process now underway between the Government of Canada and the Akaitcho First Nations for inherent land withdrawals. CBI strongly believes that those negotiations must be concluded or Akaitcho consent obtained before any additional mineral exploration activities occur within the Akaitcho region of the NWT.
- The proposed activities would occur in the Upper Thelon Basin area, designated as a Special Management Area under the draft Thelon Game Sanctuary Management Plan, which is supported by the Akaitcho First Nations, the Government of Nunavut and the Nunavut Inuit. For exploration activities to be approved within Special Management Areas, it would first be necessary to determine whether they could be carried out in a manner that was compatible with the management objectives of the Sanctuary. Until the Management Plan is approved and the necessary mechanisms developed for consultations

MacKenzie Valley Land
& Water Board

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APR 11 2006

Application # MV2006C0008

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Tel: 613 230-2739 Fax: 613 230-9685 www.borealcanada.ca

between regulatory agencies, the Management Authority established for the Sanctuary and affected First Nations, it would be premature to grant any approvals at this time.

Accordingly, CBI strongly believes that the present application should be deferred until:

- 1) Negotiations towards Interim land withdrawals and related consultations regarding mineral exploration permitting between the Government of Canada and the Akaitcho First Nations are complete; and
- 2) the Thelon Game Sanctuary Management Plan is implemented by the GNWT.

We trust that the Board will give every consideration to these comments.

Sincerely,



Cathy Wilkinson
Executive Director

Mackenzie Valley Land
& Water Board

File

APR 11 2006

Application # MV2006C0008Copied To mm/Reg

Environmental Protection and Operations Division
Suite 301, 5204-50th Ave
Yellowknife, NT, X1A 1E2

April 10th, 2006

Meg McCluskie
Regulatory Officer
Mackenzie Valley Land and Water Board
P.O. Box 2130
Yellowknife, NT
X1A 2P6

Our File:

Re: MV2006C0008-Mineral Exploration-Boomerang Lake-New LUP for UraVan Minerals Inc. Boomerang Lake Camp and Uranium Exploration Project
Proponent- UraVan Minerals Inc.

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned documents. The following comments are provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

UraVan Minerals Inc. proposes to explore for uranium mineralization by examining the lower Thelon sandstone/basement unconformity contact. The nature of the program is considered to be reconnaissance and will employ a core drill to retrieve a suite of bedrock samples from several widely spaced drill holes. Drilling will occur in the vicinity of both Boomerang and Disco Lakes, which are found south of the Thelon River and Thelon Game Sanctuary. Core drill holes amounting to 2000m of drilling will be drilled using a lightweight, heli-portable drill. Drilling is to commence around May 21st and be completed around June 21st 2006.

There will be the use of a pre-existing storage camp that will be reestablished as a personnel and equipment camp for the duration of the drilling program. The proposed camp will consist of 7 tent structures, an outhouse, a small plywood shack for the generator, as well as a woodframe/shower facility.

General Comments:

1. There is a conflict in the timing of the drilling program as it states in the Project description that drilling will occur in late winter 2006, when the ground is snow covered, however the summary describes activities as occurring during May-June 2006. Please clarify which is the correct timeline.
2. Of additional interest was the potential high level of salts (12%) proposed for use within the drilling fluids to address permafrost conditions. While the volume of waste with the suggested percentage of chlorides up to 12% should be low, it is likely that the actual % requirement for chlorides (salt) needed should be much lower (3 to 5%) given the location for drilling and the anticipated permafrost temperatures. A 12% level of salts would certainly be toxic to vegetation and appears to be inconsistent with the federal permitting. Environment Canada recommends that if the drilling waste disposed contains salts (e.g. highly mobile chlorides) that they are contained in such a manner that they will not enter a water body neither now nor in the future.

14. All non-combustible solid wastes (e.g. potable water bottles) shall be disposed of at an appropriate facility, e.g., Yellowknife, NT, or Inuvik, NT. The proponent is encouraged to make use of recycling facilities for all recyclable materials.

With respect to exploration and drilling activities, Environment Canada recommends that the following conditions be applied through all stages of the project:

1. If artesian flow is encountered, drill holes shall be plugged and permanently sealed upon project termination.
2. If ice-based drilling occurs, the Interim guidelines for On-Ice drilling will apply. Return water released to the lake must be nontoxic. Return water release must not result in an increase in total suspended solids in the waters of the lake that exceeds Canadian Council of Ministers of the Environment (CCME) Guidelines for the Protection of Freshwater Aquatic Life (i.e. 10mg/L for lakes with background levels under 100mg/L, or 10% for those above 100mg/L).
3. Drilling additives or mud shall not be used in connections with holes drilled through lake ice unless they are re-circulated, contained such that they do not enter the water, or are demonstrated to be non-toxic.
4. Drilling waste from land-based drilling should be disposed of in such a way that they do not enter any body of water.
5. If dewatering occurs, will this occur over land or into a receiving water body? If dewatering should occur at any sites, Environment Canada would like to remind the proponent that the water quality limits should be set such that the limits will be protective of the receiving environment.
6. Please note that drilling waste water and mine water should be contained in an area (e.g. sump) that is adequate for that purpose. Has Uravan Minerals Inc. considered the wastewater volumes to be encountered, and have they a contingency plan if volumes should exceed those anticipated?

The Canadian Wildlife Service (CWS) of Environment Canada has reviewed the above-mentioned submission and makes the following comments and recommendations pursuant to the *Migratory Birds Convention Act (the Act)* and *Migratory Birds Regulations (the Regulations)*, and the *Species at Risk Act (SARA)*.

1. Section 6 (a) of the Migratory Birds Regulations states that no one shall disturb or destroy the nests or eggs of migratory birds. Therefore, CWS recommends that all activities be conducted outside the migratory bird breeding season, which extends from approximately May 15 to July 31. These dates are approximate, and if active nests (i.e. nests containing eggs or young) are encountered outside of these dates the proponent should avoid the area until nesting is complete (i.e. the young have left the vicinity of the nest).
2. If activities are permitted to occur during the breeding season, CWS recommends that the proponent confirm there are no active nests (i.e. nests containing eggs or young) in the vicinity of their operations before activities commence. If active nests of migratory birds are discovered, the proponent should halt all activities until nesting is completed (i.e. the young have left the vicinity of the nest).

Environment Canada recommends:

- The primary mitigation measure for each species should be avoidance. The proponent should avoid contact with or disturbance to each species.
- The proponent should consult with the Government of the Northwest Territories and appropriate status reports, recovery strategies, action plans, and management plans to identify other appropriate mitigation measures to minimize effects to these species from the project.

The proponents should develop monitoring plans for each species in accordance with any applicable status reports, recovery strategies, action plans, and management plans and in consultation with Government of Northwest Territories and Environment Canada.

If there are any changes in the proposed project, Environment Canada should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments in regards to the foregoing. I can be reached at (867) 669-4734 or alternatively via email, jennifer.anthony@ec.gc.ca.

Yours truly,



Jen Anthony
Environmental Assessment Specialist

cc: Steve Harbicht (Head, Assessment & Monitoring, EPOD, Environment Canada, Yellowknife), Mike Fournier (Northern Environmental Assessment Coordinator, EPOD, Environment Canada, Yellowknife)

Comments and Recommendations:

1. Meeting the requirements of the *Fisheries Act* is mandatory, irrespective of any other regulatory or permitting system. Section 36(3) of the *Fisheries Act* specifies that unless authorized by federal regulation, no person shall deposit or permit the deposit of deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water. The legal definition of deleterious substance provided in subsection 34(1) of the *Fisheries Act*, in conjunction with court rulings, provides a very broad interpretation of deleterious and includes any substance with a potentially harmful chemical, physical or biological effect on fish or fish habitat.
2. All sumps, pits, spill basins and fuel caches shall be located above the high water mark of any waterbody and in such a manner as to prevent the contents from entering any waterbody frequented by fish. Therefore, please note that maintaining a buffer of 30m may not always be an adequate preventative measure.
3. All sumps shall be backfilled upon completion of the project and recontoured to match the surrounding landscape.
4. Environment Canada recommends the use of secondary containment with an impervious liner such as self-supporting insta-berms, for storage of all barreled fuel rather than relying on natural depressions to contain spills.
5. The proponent shall have a Spill Contingency Plan in place prior to establishing any fuel caches.
6. Fuel caches shall also be inspected on a regular basis.
7. A supply of spill kits, shovels, barrels, sorbents, pumps, etc. shall be consistently maintained and readily available onsite.
8. Environment Canada recommends the use of drip pans, or other similar preventative measures, when refueling equipment on site.
9. The proponent must ensure that camp wastes to be burned are incinerated in an efficient burner and that incinerator wastes are disposed of appropriately.
10. Uravan Minerals Inc. has not included the following Legislation and Guidelines pertaining to disposal of waste by incineration:
 - Canada-wide Standards (CWS) for Dioxins and Furans
 - Canada-wide Standards for Mercury Emissions
11. The proponent shall ensure that any fuel or hazardous wastes associated with the proposed projects are properly handled, transported and disposed of.
12. Please note that any spill of fuel or hazardous materials adjacent to, or into a water body, **regardless of quantity**, shall be reported immediately to the NWT 24-hour Spill Line, (867) 920-8130.
13. Environment Canada's contact number is (867) 920-5131, a 24-hour emergency pager monitored by Emergency and Enforcement Officers.

FAX MESSAGE



**Prairie and Northern Region
5204 - 50th Avenue, Suite 301
Yellowknife, NT X1A 1E2**

DATE: April 11/06

TO: MEG FROM: JEN

PHONE: _____ PHONE: _____

FAX: _____ FAX: _____

Number of pages including cover: MANY

Subject:
URAVAN

MESSAGE:

Hi Meg,
So sorry I didn't quite complete the task yesterday!
Here ya go! Enjoy!
Jen

Pearl Liske

From: Meg McCluskie [meg@mvlwb.com]
Sent: Tuesday, April 11, 2006 8:27 AM
To: mvlwbpermit@mvlwb.com
Subject: FW: MV2006C0008

-----Original Message-----

From: Leslie Wakelyn [mailto:wakelyn@theedge.ca]
Sent: Monday, April 10, 2006 10:21 PM
To: meg@mvlwb.com
Cc: 'Steve Ellis'; 'Monte Hummel'; 'Ross Thompson (BQCMB)'
Subject: MV2006C0008

Ms. McCluskie:

The attached letter from the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) provides comments on this Land Use Permit Application by Uravan Minerals. Two attachments to the letter provide background information about the BQCMB and Beverly caribou herd (Attach1) and a brief outline of the BQCMB's concerns about applications for mineral exploration in the upper Thelon watershed (Attach2).

Leslie Wakelyn
for the BQCMB

Leslie Wakelyn

BQCMB Biologist

11 Taylor Road
Yellowknife NT
X1A 2K8
Ph: (867) 920-4733
E-mail: wakelyn@theedge.ca

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

10 April 2006

Ms. Meg McCluskie
Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor, 4910 - 50th Avenue
P.O. Box 2130
Yellowknife NT X1A 2P6

Dear Ms. McCluskie:

Land Use Permit Application MV2006C0008

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on Uravan Minerals Inc.'s application for Land Use Permit MV2006C0008 regarding their proposal to conduct mineral exploration activity in the area of Boomerang Lake, NWT.

The role of the BQCMB is to work cooperatively to promote the wise use of caribou to prevent population decline and safeguard the needs of traditional hunters and others. Some background information on the BQCMB and Beverly caribou is provided in Attachment 1, and additional information is available on the BQCMB website (www.arctic-caribou.com).

The BQCMB is concerned with the amount of mineral exploration underway and proposed across the range of the Beverly caribou herd, including activities in the upper Thelon watershed. We are concerned with increasing activity in this area particularly because it is on the primary movement corridor used by the herd during their spring migration to the calving ground (see www.arctic-caribou.com/parttwo/pdf/bshi.pdf). A brief outline of our concerns is provided on Attachment 2, which is similar to materials prepared in response to last year's application by Ur-Energy to conduct mineral exploration in this area.

An important change has occurred since the review of Ur-Energy's application, however. The Department of Indian Affairs and Northern Development made a commitment to the Akaitcho Dene First Nations in November 2005 that no further prospecting permits would be issued in areas undergoing negotiations for interim land withdrawal. We understood the intent of this commitment as being to provide the Akaitcho with the opportunity to identify areas they wish to protect from industrial development, before further development proceeds and that opportunity is lost.

Secretariat Address: P.O. Box 629 Stonewall MB R0C 2Z0
Tel: (204) 467-2438 e-mail: rossthompson@mts.net
website: www.arctic-caribou.com

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

Approval of the permit application by Uravan to conduct mineral exploration in the Boomerang Lake area in 2006 - and any similar proposals for work in the upper Thelon watershed - would increase the amount of exploration activity in the area. This would also increase the expectation by Uravan and other mineral exploration companies that exploration and development will proceed in this area with no additional restrictions. Both of these results are inconsistent with the commitment made to the Akaitcho by the federal government. If Uravan's permit application is approved, it will signal to the Akaitcho and others that the MVLWB does not honour the intent of INAC's commitment, and that the two agencies are acting at cross-purposes.

For the reasons outlined above and in Attachment 2, we recommend that Uravan's application to conduct work in the Boomerang Lake area in 2006 be denied.

Sincerely,

Leslie Wakelyn
BQCMB Biologist

cc: Steve Ellis, Treaty 8 Tribal Council
Monte Hummel, World Wildlife Fund Canada

Secretariat Address: P.O. Box 629 Stonewall MB R0C 2Z0
Tel: (204) 467-2438 e-mail: rossthompson@mts.net
website: www.arctic-caribou.com

Attachment 1:

Background Information

- The Beverly and Qamanirjuaq Caribou Management Board and Beverly Caribou

What is the Beverly and Qamanirjuaq Caribou Management Board (BQCMB)?

The BQCMB was established in 1982 to co-ordinate the management of the Beverly and Qamanirjuaq caribou herds. The BQCMB operates under an agreement between the governments of the Northwest Territories (NWT), Nunavut, Saskatchewan, Manitoba, and Canada. Up to ten members represent communities across the Beverly and Qamanirjuaq caribou ranges, and five members represent governments. Membership includes representatives from the South Slave region of the NWT, the Kivalliq region of Nunavut, northern Saskatchewan, and northern Manitoba.

BQCMB Mission: To ensure the long-term conservation of the Beverly and Qamanirjuaq caribou herds for Aboriginal communities who wish to maintain a lifestyle that includes the use of caribou, as well as for all Canadians and people of other nations.

BQCMB Mandate: To advise governments and caribou range communities on ways to protect the Beverly and Qamanirjuaq caribou herds and their ranges. This includes development of a Caribou Management Plan which outlines principles, goals and priorities for caribou conservation, as well as ways in which the BQCMB will work co-operatively with governments, communities and other organizations to incorporate the scientific work of biologists and the traditional knowledge of Aboriginal peoples during development of recommendations.

The BQCMB has more than 20 years of experience tracking developments on the Beverly and Qamanirjuaq caribou ranges, including participation in environmental assessments of proposed uranium mines, and reporting on the impacts of uranium mining. The BQCMB has produced various tools for assessing the potential impacts of developments on the caribou ranges, and has developed a clear position on action needed to protect the caribou herds in this era of increasing northern development.

A BQCMB position paper, which is available on the Board's website (www.arctic-caribou.com), describes action needed to protect Beverly and Qamanirjuaq caribou and caribou range. This paper provides five key recommendations, and describes various issues and principles used to develop these recommendations.

The Beverly Caribou Herd

Herd Size and Status

The number of caribou in the Beverly herd has been estimated by government biologists numerous times over the past 50 years. However, caribou counts on the spring and winter ranges from the late 1940s to the 1960s did not provide adequate information for determining whether the herd was increasing or decreasing.

Calving ground surveys from 1971 to 1980 suggested that the herd was declining. Total herd size was estimated to be about 105,000 in 1980. Biologists believed that the herd would soon be in trouble if the number of animals harvested was not reduced. However, many Inuit hunters believed that the herd was actually increasing, or that it was using different parts of the range, and did not agree that hunting was a problem.

Surveys of Beverly caribou conducted in the 1980s indicated increasing herd size. Population estimates were 125,000 in 1982 and 190,000 in 1988. The 1994 population survey of the Beverly herd indicated that the trend had continued, resulting in a herd size of 276,000 caribou.

However, recent surveys of four other NWT barren-ground caribou herds have shown that these herds are declining, so the Beverly herd may also be decreasing. The next population survey of the Beverly herd is planned for 2007.

Range Location and Use

A series of maps showing seasonal ranges of Beverly caribou are available on the BQCMB website (www.arctic-caribou.com/parttwo/mapatlas.html). These maps were produced by the BQCMB based on information obtained during government surveys from 1940 to 1995, and can be used to identify the geographic relationship of the upper Thelon watershed to seasonal range use by Beverly caribou.

Beverly caribou have migrated across the northern Canadian landscape for thousands of years, traveling as far as 2000 kilometres each year. The range used by this herd over the past 60 years extends across a huge and diverse area, from the boreal forests of Saskatchewan, across the subarctic taiga of the NWT, to the arctic tundra of west-central Nunavut (www.arctic-caribou.com/parttwo/pdf/bqtotca.pdf).

The total range used by the herd during this period extends almost 1000 kilometres from south to north. In some years, however, the caribou have remained north of the historic forested winter range in northern Saskatchewan and Manitoba. Because the herd overlaps with Bathurst caribou on the west and the Qamanirjuaq herd on the east, it is difficult to determine the western and eastern limits of the Beverly range. However, Beverly caribou range is at least 600 kilometres from west to east.

The Beverly herd migrates northward each spring to the calving grounds, and then travels back toward the more southerly winter range in July, and again each fall. Every

year Beverly caribou return to the same general area for calving, although not to the same specific location. Consequently, the Beverly herd's traditional calving grounds (the total area known to be used for calving over many years) are much larger than the area used in any particular year. The Beverly herd's calving grounds (approximately 38,400 sq. km.) extend from the area around the lower Thelon River and Beverly and Aberdeen lakes, north towards the Back River and Pelly and Garry lakes, and have been described by surveys in 23 years between 1957 and 1994. Calving ground surveys found that most Beverly caribou calved in the southeastern half of the traditional calving grounds between 1957 and 1974, but that calving occurred primarily in the northern portion of the calving ground since 1980. This is why the entire traditional calving grounds, not just the area used for calving in one year, are important to the herd over the long-term.

Unlike all other mainland barren-ground caribou herds, which spend part of their annual cycle in coastal areas, Beverly caribou remain inland year-round. The landscape through which the Beverly herd travels can be characterized as primarily wilderness, including hundreds of wild rivers and lakes, and one of the largest protected natural areas in North America, the Thelon Wildlife Sanctuary. Human habitation on the range is limited to 10 small communities around the fringes of the range, and five others nearby.

The Value of the Caribou Herds

Beverly and Qamanirjuaq caribou herds are an extremely valuable resource for four territorial and provincial governments and the federal government, and for about 20 communities. The Beverly herd is harvested by Dene, Metis, Cree, Inuit and non-aboriginal people from about a dozen communities in NWT, Nunavut, Saskatchewan and Manitoba.

The minimum gross economic value of Beverly and Qamanirjuaq caribou harvested in a single year is about \$17 million. The cultural and spiritual value of the herds is immense.

Attachment 2:

Mineral Exploration in the Upper Thelon Watershed - Issues for Beverly Caribou and the Beverly and Qamanirjuaq Caribou Management Board

Why is the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) concerned about applications for mineral exploration in the upper Thelon watershed? The six main issues concerning these permit applications that directly relate to the mandate of the BQCMB are outlined briefly below.

1. Potential impacts of exploration on Beverly caribou and caribou habitat. The Boomerang Lake area is located on key habitat for Beverly caribou, including their primary spring migration corridor and key water crossings (see maps at www.arctic-caribou.com/parttwo/mapatlas.html). Potential impacts include the direct effects of exploration on caribou, such as disturbance from aircraft, and significant habitat loss that may result from avoidance of exploration activities near important water crossings.
2. Potential impacts of uranium mining and other development activities on the Beverly caribou herd and caribou range, including downstream effects on the integrity of the Thelon watershed. The effects on Beverly caribou include impacts from existing and abandoned uranium mines in northern Saskatchewan. This concern reflects experience gained by the BQCMB in the review of uranium mine proposals near Baker Lake and in northern Saskatchewan, and concerns about abandoned and operating uranium mines in northern Saskatchewan.
3. The need for an assessment of the cumulative effects of increasing levels of exploration and development across the annual range of Beverly caribou. This assessment must take into account accumulating effects of activities encountered by Beverly caribou within and between years, from the mines and roads on the winter range in Saskatchewan to increasing levels of exploration on the calving and post-calving areas in Nunavut. An upper threshold of activity that will allow the Beverly caribou herd to continue to thrive should be identified.
4. The precedent that will be set by the decision made about this permit application, particularly in light of the federal government's commitment to the Akaitcho to not issue prospecting permits in 2006 in this area. The inevitability of increased exploration and development in the upper Thelon watershed, should this and other permits be granted in this area in 2006, would be of great concern to the BQCMB. An additional concern would be subsequent pressure to open up the Thelon Wildlife Sanctuary to development that would potentially result from successful exploration in the upper Thelon watershed. This would be contrary to recommendations made by the Akaitcho Dene and Inuit of Baker Lake regarding the Thelon Sanctuary Management Plan and establishment of Special Management Areas.

5. The consequences of permitting exploration in the upper Thelon watershed on ongoing plans and processes for establishing protected areas in this region. Our Board supports the “conservation first” principle, which means that neither exploration nor development would be permitted in areas that have been identified for protection or are under negotiation by the Akaitcho, including areas for which boundaries are currently being selected.
6. The detrimental effect that increasing exploration and development across the annual range of the Beverly caribou herd may have on the ability of the Akaitcho Dene and the Inuit of Baker Lake to maintain a lifestyle that includes the use of caribou. This issue is fundamental to the mandate of the BQCMB, results from all issues outlined above and is of increasing concern.

Pearl Liske

From: Monte Hummel [mhummel@wwfcanada.org]
Sent: Friday, April 07, 2006 2:48 PM
To: meg@mvlwb.com
Cc: scellis@eastarm.com; rossthompson@mts.net
Subject: Land Use Permit MV2006C0008

Dear Ms McCluskie,

Please find attached a Word file containing a letter with comments on Uravan Minerals Inc's application for Land Use Permit MV2006C008, as well as a PDF file capturing a letter by the Government of Canada.

Sincerely,

Monte Hummel
President Emeritus
WWF - Canada
410-245 Eglinton Ave. East
(416) 489-8800 Ext. 7223

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April 7, 2006

Ms Meg McCluskie
Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor-4910 50th Avenue
P.O. Box 2130
Yellowknife, NT
X1A 2P6

Re: Land Use Permit MV2006C0008

Dear Ms McCluskie,

On behalf of World Wildlife Fund Canada (WWF), I am submitting comments on Uravan Minerals Inc.'s application for Land Use Permit MV2006C0008 regarding mineral exploration at Boomerang Lake, NWT.

For six years now, WWF has worked co-operatively with the Lutsel K'e Dene First Nation in the NWT, and with the Baker Lake Hunters and Trappers Association in Nunavut, to obtain government approval for the Thelon Wildlife Sanctuary Management Plan. This Plan includes proposed Special Management Areas contiguous with and to the northeast of the Sanctuary to include the calving area of the Beverly caribou herd in Nunavut, and to the southwest in the NWT to include the headwaters of the Thelon River, including the Upper Thelon Basin where Uravan's exploration is proposed. WWF's significant investment in this work was documented at length in our submission last June to the Mackenzie Valley Environmental Impact and Review Board in connection with that board's Environmental Assessment of an application by UR-Energy, also for uranium exploration in the Upper Thelon. For over ten years now, WWF has maintained a full-time presence and office in the NWT (Yellowknife), therefore in future I would appreciate it if WWF-Canada were included and circulated by proponents in the course of their "stakeholder consultations."

WWF strongly recommends that Uravan's application be deferred until current negotiations between the Akaitcho First Nations and the Government of Canada have determined which lands are going to be withdrawn for interim protection.

WWF shares Akaitcho concerns regarding caribou migration and condition; natural, cultural, recreational and spiritual importance of the Thelon; potential infringement of Aboriginal rights; the pre-



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eminence of the interim land withdrawals now being negotiated for Akaitcho territory; and their desire to implement the Thelon Wildlife Sanctuary Management Plan, especially the proposed Special Management Area in the Upper Thelon Basin.

In WWF's view, what's at stake here is not whether uranium mining is good or a bad, or whether it will ever proceed, but whether the people who live there will be given the chance to determine what areas they want to protect while they still have the opportunity to do so. In effect, the Akaitcho are insisting on a "breathing space" from further industrial development, in order to determine what balance they want to see between protection and development in their territory.

By agreeing not to issue any new mineral permits without Akaitcho approval and until negotiations regarding land withdrawals are completed, the Government of Canada has explicitly agreed to provide the Akaitcho with such a breathing space (see attached letter, dated Nov. 28th, 2005). In our view, it would violate both the spirit and the letter of this agreement to allow further permitting at this time.

Sincerely,

Monte Hummel, O.C.
President Emeritus,
World Wildlife Fund Canada

CC: Stephen Ellis, Treaty 8 Tribal Council
Ross Thompson, Beverly and Qamanirjuaq Caribou Management Board

Affaires Canada
www.inac.gc.ca

et du Nord Canada
www.ainc.gc.ca

Box 1500
Yellowknife, NWT X1A 2R3

To	Steve Ellis	From	James Lawrence
Co./Dept.	IMACoord.	Co.	DIAND, NWT
Phone #		Phone #	(867) 669-2583
Fax #	370-3209	Fax #	

November 28, 2005

Our file - Notre référence

RECEIVED
Nov 29 2005

Chief Peter Liske,
Yellowknives Dene First Nation
P.O. Box 2514
Yellowknife, NWT X1A 2P8

Dear Chief Liske:

Thank you for the opportunity to meet with you on November 25, 2005 in Ndilo to further discuss the issuance of 2006 Prospecting Permits. The meeting was held to follow up on concerns you raised in Ottawa on November 18, 2005 with the Honourable Minister of State, Ethel Blondin-Andrew, regarding the potential conflict between the prospecting permit process and the interim land withdrawal negotiations. This letter confirms the approach agreed upon at our Ndilo meeting to address these concerns.

At the meeting, the Department of Indian Affairs and Northern Development made the following commitments:

- the Department will not issue prospecting permits in areas that have been identified and agreed to by the parties negotiating interim land withdrawal, pursuant to the Interim Land Withdrawal Protocol signed on November 21, 2005, which is part of the ongoing Akaitcho lands, resources and governance negotiations; and,
- by early January 2006, the Department will provide notification to the Akaitcho Dene First Nations on prospecting permit applications, as has been the practice in previous years, and departmental representatives can discuss these applications in more detail with individual Akaitcho Dene First Nations if requested.

At the end of the meeting, we both agreed to meet, if necessary, on January 20, 2006 in Lutsel K'e to review the status of the permit applications.

In addition, we discussed with you the Department's plans to notify potential applicants, in advance of December 1, 2005, that permits in certain areas of Akaitcho territory may not be issued this year. Attached is the notice we will be distributing this week, which was provided to your officials for comment in advance to ensure that we had adequately addressed your concerns with confidentiality related to the Interim Land Withdrawal Protocol.

...2/

Canada

Finally, we recognize the concerns you raised about establishing an ongoing process for consultations on prospecting permits. We share your interest in resolving this issue well before the next prospecting permit season, and have raised this with Dennis Wallace, the Chief Federal Negotiator, so for discussion at the main table.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Lawrance', with a long horizontal flourish extending to the right.

James Lawrance
Director, Aboriginal & Territorial Relations

encl.

cc Sharon Venne, Chief Negotiator, NWT Treaty 8 Tribal Corporation
Steve Ellis, IMA Coordinator
Jim Joudrin, Legal Counsel
Ted Tsetta, Community Negotiator
Dennis Wallace, Chief Federal Negotiator

Pearl Liske

From: Tanja Rarog [Tanja_Rarog@gov.nt.ca]
Sent: Monday, April 10, 2006 9:32 AM
To: MacKenzie Valley (E-mail)
Subject: Land Use Permit MV2006C0008

These comments are submitted from the Environmental Health Office with the Stanton Territorial Health Authority regarding the above Land Use Application. In regards to the outhouse construction and sewage disposal please ensure that the following is complied with: 1. Outhouse needs to be located at least 6 meters away from any building used for human habitation or for the storage, preparation or consumption of food 2. On the closing of the camp, the privy pit needs to be covered with earth to a depth of at least 300 mm. Also, please ensure that water used for human consumption is treated.

Should you have any questions/concerns I can be reached at 669-6722.

Tanja Rarog
Environmental Health Officer
Stanton Territorial Health Authority
1st Floor Diamond Plaza, 5204-50th Avenue
Yellowknife, X1A 1E2
Phone: (867) 669-6722
Fax: (867) 669-7517
E-mail: tanja_rarog@gov.nt.ca

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Pearl Liske

From: David Pelly [dpelly@sympatico.ca]
Sent: Friday, April 07, 2006 11:02 AM
To: meg@mvlwb.com
Subject: Uravan proposal - your file MV2006C0008

Please add the attached letter to your file of documents to be considered following your deadline of this coming Monday on the Uravan proposal.

Thank you for your consideration.

David Pelly

David F. Pelly
Tel/Fax: 613-565-4265
www.davidpelly.com

TO: MVLWB

7 April 2006

Re: File # MV2006C0008 - Proposed Drilling by Uravan near Beaverhill Lake, NWT

Thank you for the opportunity to submit my concerns, regarding this proposed development, to the MVLWB. I do so in at least five capacities: as a concerned citizen of Canada; as a former resident of the NWT; as an ardent supporter of the First Nations' right of self-determination; as a wilderness canoeist who has been travelling the barrenlands for 30 years; and as an author who has written extensively on the history and culture of the Thelon basin.

I believe the first and foremost reason to deny Uravan the green light to proceed at this time is that the Lutsel K'e Dene First Nation's stated desire to develop a network of protected areas in the upper Thelon basin should (as a matter of principle) take precedence. Until that process is completed, no further mineral exploration should be permitted. In fact, I believe they reached such an accord with INAC. The simple reason for this is that once exploration proceeds, the development of mines becomes virtually a "right" of the mining interests who have invested in the exploration, which has the effect of prioritizing the development of a mine over the creation of a protected area. That does not appear to be congruent with the wishes of the LKDFN.

One of the concerns raised by the LKDFN is "the cultural significance of the area" in question. The archaeological record is absolutely definitive that this area was heavily used by Dene for centuries. Today's Dene make it clear that they retain this connection to the land. These are people who draw their strength, their very sense of being, from the land. In the long term, if we as a society allow this land to be consumed by first one mine, then another, and another, and so on, we will in effect be extinguishing the existence of the Dene as a distinct people.

"Ah, but we are only talking about one potential mine," I can hear the Uravan people saying. This is true, but the reality, as we all know, is that their program, if it were to proceed, would almost certainly be the thin end of the wedge. It is incumbent upon the MVLWB to anticipate the cumulative effects of allowing this development to proceed, and not to isolate the arguably "limited" impact of this project alone. This project, if approved, has the potential to open the doors to others.

While "the cultural significance of the area" to the Dene is of utmost importance to your present considerations, the upper Thelon basin also has cultural significance for other sectors of Canadian society. This, too, ought surely to be considered by the Board.

I have examined the cultural importance of this area in some depth (please see my book: *Thelon – A River Sanctuary*), as perceived by a range of Canadians both historically and today. The book, I believe, does a particularly thorough job of detailing the area's historic significance, so I will not elaborate further here. But I would urge you to review the material in this book, as part of your considerations.

The Thelon basin today, at the very heart of the largest tract of wilderness left in North America, has an importance to Canadians who do not even know exactly where it is. It is part of the Canadian psyche, part of our national identity and culture, that we have in this country a vast untouched wilderness to the north. We erode that wilderness at our peril. Eventually, when the map of northern Canada is dotted with mines, and then roads, and the infrastructure which would inevitably follow, there would no longer be a distinct Canada. The popular Canadian singer/songwriter Murray MacLaughlin sang that “the soul of Canada lies out past the timberline.” He is right. And when that soul is destroyed, there will be no more “Canada” – there will only be USA North. I would argue that, if we want to preserve this country's cultural identity for future generations, we have no option but to protect the vast sweep of wilderness where our soul resides, precisely the area surrounding the Thelon basin.

* * *

There are other points which I am certain will be more fully examined by others' submissions, but which are valid concerns in my view, so I will just briefly mention the following issues which I also support:

- The Inuit of Baker Lake have long expressed concern about the quality of water coming down the Thelon River, which affects not only their drinking water, but also the fish and caribou upon which they depend. This, among other factors, moved them to oppose the development of a uranium mine in the lower Thelon basin some 15 years ago. (I lived in Baker Lake in the 1980s, and have visited there several times in recent years.) On several occasions during the past two years, during discussions of the proposed Special Management Areas adjacent to the Thelon Sanctuary, I heard vocal support for the protection of the upper Thelon basin as a measure which would serve their interests, based chiefly on a desire to protect their water supply.
- The caribou of the Beverly population migrate through this area twice annually, northbound in spring, and southbound in late summer. These are the animals upon which the Dene of Lutsel K'e and the Inuit of Baker Lake depend. One mine would not threaten their existence, it is true. But each step along the path of development disturbs the caribou's traditional cycle, and interferes with their time-worn migratory patterns. The more disturbed they become, the less reliable they are as a source of food. And that is to say nothing of their intrinsic value, *per se*, as a species.

- Wilderness canoeists in southern Canada think of the entire length of the Thelon river as a sort of Mecca. It is the one river which canoeists across Canada most often mention as the northern trip they dream of making some day. If they were given a voice in this deliberation, it would deliver a loud and clear message to leave this area alone.
- *The Globe and Mail* last year reported that the price of uranium is rising and is expected to continue to rise in the years ahead. Why? According to the article, because 30 nuclear power plants are presently under construction in 11 different countries, mainly in Asia. And construction of 34 more such plants is planned. “China, India and Russia are expected to dramatically increase their nuclear capacity within the next 15 years.” Can it really be that important to Canada as a nation, or to the Lutsel K’e Dene in particular, to ensure the future fuel supply of these reactors? I think not. Apart from a few people (Uravan et al) making money, this proposal does little to serve Canada. It is not intended primarily to serve Canada’s energy needs. It is not intended to develop a uranium-processing business in Lutsel K’e where local Dene might be employed. It is, in fact, designed to benefit only a tiny handful of Canadians (Uravan employees and shareholders) by exploiting land that has no other value to them as individuals and ignoring the many more Canadians for whom this land has immensely greater and more diverse value. Where is the balance in that?

Thank you for your consideration.

David F. Pelly
tel/fax: 613-565-4265
email: dpelly@sympatico.ca

Pearl Liske

From: Alex Hall [alex@canoeartctic.com]
Sent: Saturday, April 08, 2006 2:40 PM
To: mvlwbpermit@mvlwb.com
Subject: Fw: Land Use Permit # MV2006C0008 for Uravan Minerals, Inc.

----- Original Message -----

From: [Alex Hall](#)
To: meg@mvlwb.com
Sent: Saturday, April 08, 2006 2:26 PM
Subject: Re: Land Use Permit # MV2006C0008 for Uravan Minerals, Inc.

To: MacKenzie Valley Land and Water Board April, 8, 2006.

Re: Land Use Permit # MV2006C0008---Proposed Drilling by Uravan Minerals, Inc. at "Boomerang Lake" in Upper Thelon River area, NWT.

As a longtime tourism operator on the Thelon River, and as someone who has fought for decades to keep this most pristine part of North America's last great wilderness out of the clutches of the uranium industry, I join the Lutsel K'e Dene First Nation's (LKDFN) objection to the issuance of a drilling permit for Uravan Energy near the Thelon River just south of the Thelon Wildlife Sanctuary. As your board is aware, the federal government has recently agreed to the LKDFN request to allow no further prospecting permits in the upper Thelon River area before Lutsel K'e has decided what lands they wish to protect as wilderness for future generations of Canadians. In fact, I find it difficult to understand the logic behind Uravan's request for a permit to drill for uranium since they must know the area they are prospecting is most likely to be withdrawn very soon from all forms of industrial activity. Extracting more financial compensation from the federal government when the area is protected is the only reason I can think of for Uravan's proposed drilling program.

For the past thirty-two years, I have made my living by operating guided canoe trips in the Thelon Rver basin under the name of my business, Canoe Arctic, Inc. At least half of my canoe trips each summer are located on the upper Thelon River system with the rest farther north in the Thelon Wildlife Sanctuary. My clients come from as far away as Europe, Australia and South Africa (but most come from the USA and Canada) to experience the remote pristine wilderness of this part of the central Barren Lands and the abundant wildlife that dwells there. Mineral exploration and development are not compatible with the way the Thelon watershed is currently being used by tourism businesses like mine or by the many independent wilderness canoeists who come from all over the world to paddle the Thelon every summer.

The Barren Lands are the largest wilderness left in North America and one of the last virtually untouched areas remaining on earth. The Thelon River basin is some of the purest wilderness left in Canada, as yet largely unspoiled by mineral exploration and development. I urge the MacKenzie Valley Land and Water Board to keep it that way.

I have travelled all over the Barren Lands and in my experience the most spectacular parts are the area surrounding Bathurst Inlet and the upper Thelon watershed. Bathurst Inlet and the upper Thelon are very different kinds of places, but in my opinion the big, treed, sandy eskers of the upper Thelon are by far the most stunning features in the Barren Lands. Indeed, these eskers are so prominent that they can be seen from outer space. For me, this area contains the most beautiful landscape on earth and I am someone who has seen a good deal of the rest of the world.

The upper Thelon country is also one of the most spectacular wildlife areas left on our planet. Except for the game parks of East and southern Africa, it is second to none. In terms of wildlife, the upper Thelon is comparable to the Thelon Wildlife Sanctuary in both variety of species and populations. It contains the major migration routes of the half-million caribou of the Beverly and Ahlak herds, as well as minor migration routes of the Bathurst caribou herd. The upper Thelon also contains larger populations of muskoxen than are currently found inside the sanctuary. There are large and growing numbers of grizzlies and wolverines and the area has one of the largest populations of breeding wolves in Canada. The upper and middle Thelon is also North America's most important moulting ground for the larger subspecies of Canada geese.

On our canoe trips on the upper Thelon we have encountered all five large mammal species---caribou, muskoxen, wolves, moose and grizzlies---during the course of a single day. On a typical eleven-day canoe trip

here we have seen as many as 100,000 caribou, well over 100 muskoxen, up to twenty wolves, a dozen moose, a half-dozen grizzlies and several wolverines. The Thelon watershed is easily the most spectacular wildlife area in Canada---a true national treasure.

The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) has recently released a position paper calling for legislated protection for the calving grounds and post-calving areas of the Beverly and Qamanirjuaq caribou herds in the NWT and Nunavut. I have provided the BQCMB with my observations on caribou migrations since 1990. These observations show that the post-calving areas for the Beverly herd include all of the Thelon Wildlife Sanctuary and the entire upper Thelon watershed (the BQCMB defines "post-calving areas" as those areas used by cows and calves from late June to the end of July).

If the hopes and dreams of the people of Lutsel K'e and of Baker Lake in Nunavut are realized, we are likely to end up with one of the two or three largest areas of protected wilderness on the planet, and by far the largest in North America---a priceless gift from Aboriginal peoples to future generations of all Canadians. You members of this board now find yourselves standing guard at the gates of a northern Eden that is the envy of the rest of the world. The uranium industry wants you to let them in to plunder it. You can stop them in their tracks. I know what decision most Canadians would want you to make. And in your hearts you know it too.

Thank you for this opportunity to address your board.

Alex Hall
Canoe Arctic, Inc.
P. O. Box 130,
Fort Smith, NT
X0E 0P0
Tel: (867) 872-2308
Email:alex@canoeartctic.com

Pearl Liske

From: David Pelly [dpelly@sympatico.ca]
Sent: Friday, April 07, 2006 11:13 AM
To: mvlwbpermit@mvlwb.com
Subject: FW: Uravan proposal - your file MV2006C0008

-----Original Message-----

From: David Pelly [mailto:dpelly@sympatico.ca]
Sent: April 7, 2006 1:02 PM
To: 'meg@mvlwb.com'
Subject: Uravan proposal - your file MV2006C0008

Please add the attached letter to your file of documents to be considered following your deadline of this coming Monday on the Uravan proposal.

Thank you for your consideration.

David Pelly

David F. Pelly
Tel/Fax: 613-565-4265
www.davidpelly.com

TO: MVLWB

7 April 2006

Re: File # MV2006C0008 - Proposed Drilling by Uravan near Beaverhill Lake, NWT

Thank you for the opportunity to submit my concerns, regarding this proposed development, to the MVLWB. I do so in at least five capacities: as a concerned citizen of Canada; as a former resident of the NWT; as an ardent supporter of the First Nations' right of self-determination; as a wilderness canoeist who has been travelling the barrenlands for 30 years; and as an author who has written extensively on the history and culture of the Thelon basin.

I believe the first and foremost reason to deny Uravan the green light to proceed at this time is that the Lutsel K'e Dene First Nation's stated desire to develop a network of protected areas in the upper Thelon basin should (as a matter of principle) take precedence. Until that process is completed, no further mineral exploration should be permitted. In fact, I believe they reached such an accord with INAC. The simple reason for this is that once exploration proceeds, the development of mines becomes virtually a "right" of the mining interests who have invested in the exploration, which has the effect of prioritizing the development of a mine over the creation of a protected area. That does not appear to be congruent with the wishes of the LKDFN.

One of the concerns raised by the LKDFN is "the cultural significance of the area" in question. The archaeological record is absolutely definitive that this area was heavily used by Dene for centuries. Today's Dene make it clear that they retain this connection to the land. These are people who draw their strength, their very sense of being, from the land. In the long term, if we as a society allow this land to be consumed by first one mine, then another, and another, and so on, we will in effect be extinguishing the existence of the Dene as a distinct people.

"Ah, but we are only talking about one potential mine," I can hear the Uravan people saying. This is true, but the reality, as we all know, is that their program, if it were to proceed, would almost certainly be the thin end of the wedge. It is incumbent upon the MVLWB to anticipate the cumulative effects of allowing this development to proceed, and not to isolate the arguably "limited" impact of this project alone. This project, if approved, has the potential to open the doors to others.

While "the cultural significance of the area" to the Dene is of utmost importance to your present considerations, the upper Thelon basin also has cultural significance for other sectors of Canadian society. This, too, ought surely to be considered by the Board.

I have examined the cultural importance of this area in some depth (please see my book: *Thelon – A River Sanctuary*), as perceived by a range of Canadians both historically and today. The book, I believe, does a particularly thorough job of detailing the area's historic significance, so I will not elaborate further here. But I would urge you to review the material in this book, as part of your considerations.

The Thelon basin today, at the very heart of the largest tract of wilderness left in North America, has an importance to Canadians who do not even know exactly where it is. It is part of the Canadian psyche, part of our national identity and culture, that we have in this country a vast untouched wilderness to the north. We erode that wilderness at our peril. Eventually, when the map of northern Canada is dotted with mines, and then roads, and the infrastructure which would inevitably follow, there would no longer be a distinct Canada. The popular Canadian singer/songwriter Murray MacLaughlin sang that “the soul of Canada lies out past the timberline.” He is right. And when that soul is destroyed, there will be no more “Canada” – there will only be USA North. I would argue that, if we want to preserve this country's cultural identity for future generations, we have no option but to protect the vast sweep of wilderness where our soul resides, precisely the area surrounding the Thelon basin.

* * *

There are other points which I am certain will be more fully examined by others' submissions, but which are valid concerns in my view, so I will just briefly mention the following issues which I also support:

- The Inuit of Baker Lake have long expressed concern about the quality of water coming down the Thelon River, which affects not only their drinking water, but also the fish and caribou upon which they depend. This, among other factors, moved them to oppose the development of a uranium mine in the lower Thelon basin some 15 years ago. (I lived in Baker Lake in the 1980s, and have visited there several times in recent years.) On several occasions during the past two years, during discussions of the proposed Special Management Areas adjacent to the Thelon Sanctuary, I heard vocal support for the protection of the upper Thelon basin as a measure which would serve their interests, based chiefly on a desire to protect their water supply.
- The caribou of the Beverly population migrate through this area twice annually, northbound in spring, and southbound in late summer. These are the animals upon which the Dene of Lutsel K'e and the Inuit of Baker Lake depend. One mine would not threaten their existence, it is true. But each step along the path of development disturbs the caribou's traditional cycle, and interferes with their time-worn migratory patterns. The more disturbed they become, the less reliable they are as a source of food. And that is to say nothing of their intrinsic value, *per se*, as a species.

- Wilderness canoeists in southern Canada think of the entire length of the Thelon river as a sort of Mecca. It is the one river which canoeists across Canada most often mention as the northern trip they dream of making some day. If they were given a voice in this deliberation, it would deliver a loud and clear message to leave this area alone.
- *The Globe and Mail* last year reported that the price of uranium is rising and is expected to continue to rise in the years ahead. Why? According to the article, because 30 nuclear power plants are presently under construction in 11 different countries, mainly in Asia. And construction of 34 more such plants is planned. “China, India and Russia are expected to dramatically increase their nuclear capacity within the next 15 years.” Can it really be that important to Canada as a nation, or to the Lutsel K’e Dene in particular, to ensure the future fuel supply of these reactors? I think not. Apart from a few people (Uravan et al) making money, this proposal does little to serve Canada. It is not intended primarily to serve Canada’s energy needs. It is not intended to develop a uranium-processing business in Lutsel K’e where local Dene might be employed. It is, in fact, designed to benefit only a tiny handful of Canadians (Uravan employees and shareholders) by exploiting land that has no other value to them as individuals and ignoring the many more Canadians for whom this land has immensely greater and more diverse value. Where is the balance in that?

Thank you for your consideration.

David F. Pelly
tel/fax: 613-565-4265
email: dpelly@sympatico.ca



Akaitcho Interim Measures Agreement Implementation Office
NWT Treaty #8 Tribal Corporation

Stephen Ellis – Akaitcho IMA Implementation Coordinator
 NWT Treaty #8 Tribal Corporation
 Box 28
 Lutsel K'e, NT X0E 1A0
 Ph: (867)-370-3217
 Fax: (867)-370-3209

Mackenzie Valley Land
 & Water Board

File

APR - 6 2006

Application # MY2006C0008

Copied To MM/Reg

April 6, 2006

Meg McCluskie – Regulatory Officer
 Mackenzie Valley Land and Water Board
 Box 2130
 7th Floor – 4910 50th Avenue
 Yellowknife, NT X1A 2P6
 Fax: (867) 873-6610

RE: MV2006C0008

Dear Ms. McCluskie:

The Akaitcho IMA Office has recently reviewed application MV2006C0008 submitted by Uravan Minerals Inc. for mineral exploration activities in the Boomerang Lake area. We have the following comments and concerns regarding the proposed exploration activity:

- The Thelon River valley is of significant importance to the Akaitcho Dene First Nations (AKFNs). It is an extremely sacred place, referred to by the elders as "The Place where God began". The area around Beaverhill Lake has been regularly used by the AKFNs during the practice of traditional land use activities (hunting, fishing, and trapping). Exploration activities will compromise the spiritual and natural character of the area, and may infringe upon the constitutionally-entrenched aboriginal and Treaty rights of the AKFNs.
- While Uravan has been quite forthcoming in sharing information about their proposed exploration activities, they have not engaged in any direct consultation with any of the AKFNs.
- The AKFNs are seriously concerned about the impacts of industrial development in the Thelon valley upon the Beverly caribou herd. The Lutsel K'e Dene First Nation (LKDFN), through its ongoing environmental monitoring program, has noticed a marked decline in

the numbers and condition of the Bathurst caribou since the construction of diamond mines in the Slave Geological Province. The monitoring program has also detected changes in the migratory paths of the Bathurst herd.

LKDFN elders and land-users partially attribute the decline in number and body condition, and changes to migratory patterns, to disturbances caused by diamond mines and exploration activities. Simply, the Bathurst caribou are being disturbed from their natural feeding habits, and are being deflected from their traditional migration routes. These conclusions are supported by a growing body of scientific evidence showing that northern industrial development can adversely impact the numbers, condition and movements of caribou (*Arctic*, Cameron et al. 2005; *Canadian Field-Naturalist*, Curatalo and Murphy 1986; *Acta Zoologica Fennica*, Smith and Cameron 1983). The AKFNs fear that industrial development in the Thelon watershed will result in similar negative impacts to the Beverly caribou herd. Currently, this caribou herd remains numerous, in good condition, and maintain their historic migration patterns. The AKFNs wish this to remain so forever, as the integrity of the Beverly herd is critical to the continued health and wellness of the AKFNs.

- The Dene of Lutsel K'e and the Inuit of Baker Lake have a long standing relationship and are committed to protect each and others interests on either side of the NWT / Nunavut boundary. The Inuit have committed to protect the calving grounds of the Beverly caribou, a herd upon which the Dene depend for much of the winter. The Dene, for their part, have pledged to protect the waters of the Thelon, which eventually spill into Baker Lake.
- In the interest of protecting the Thelon, the AKFNs are pursuing the conservation of the upper Thelon watershed in its natural state. In the short term, the AKFNs, Canada, and the GNWT are negotiating the interim withdrawal of certain lands within the Akaitcho territory. The AKFNs have identified much of the upper Thelon watershed for inclusion in this interim withdrawal. In the long term, the AKFNs are seeking permanent protection for the upper Thelon through the addition of a "Special Management Area" to the existing Thelon Wildlife Sanctuary. This is provided for in the Thelon Wildlife Sanctuary Management Plan, which has been approved by Canada, all the relevant authorities in Nunavut, and the LKDFN. Such protection is seen as essential to maintain the overall environmental, cultural, and recreational quality of the Thelon watershed.

Following upon the comments and concerns described above, the Akaitcho IMA Office requests the following measures be taken:

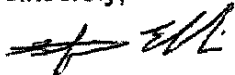
- Pursuant to Section 4 of the *Policy Direction to the Mackenzie Valley Land and Water Board regarding the Akaitcho Dene First Nations* (February 23, 2004), the MVLWB should direct Uravan Minerals Inc. to arrange for a study by an independent agency agreeable to all parties on the use of their areas of interest by members of the AKFNs. If it is determined through this study that the aboriginal and Treaty rights of the AKFNs might be compromised were the proponent approved to engage in exploration activities, accommodation and potentially compensation will have to be negotiated with the AKFNs.
- Canada has signed the Akaitcho Interim Land Withdrawal Protocol and is currently engaged in the implementation of this protocol. Canada has also approved the Thelon

Game Sanctuary Management Plan. To insure the honour of the Crown, it is critical that regulatory actions do not hamper either the land withdrawal negotiations or the implementation of the Management Plan. The MVLWB should consult INAC to see whether the issuance of a permit to Uravan would constitute "bad faith" and prejudice the interim land withdrawals or Management Plan implementation.

- Uravan should be directed to engage in face-to-face consultations with the AKFNs, particularly the LKDFN. Such consultation is critical to foster understanding between the proponent and the First Nation, and serves as a vehicle for the eventual negotiation of an access agreement were the First Nation to consent to the exploration activity.

It is expected that the MVLWB will take action in implementing the measures identified in this letter, and will notify the Akaitcho IMA Office and the AKFNs accordingly.

Sincerely,



Stephen Ellis – Akaitcho IMA Implementation Coordinator
NWT Treaty #8 Tribal Corporation

- c. Ted Tsetta – YKDFN Lands Coordinator
Peter Enzoe – Chair, LKDFN Wildlife, Lands, and Environment Committee
Georgina Biscaye – Community IMA Coordinator, DKFN
Jonas Sangris – YKDFN Negotiator
Steven Nitah – LKDFN Negotiator
Paul Boucher – DKFN Negotiator
Sharon Vonne – Chief Akaitcho Negotiator
Chief Adeline Jonasson – LKDFN

NORTH SLAVE METIS ALLIANCE

PO Box 2301 Yellowknife, NT X1A 2P7



Meg McCluskie – Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor – 4910 50th Ave, PO Box 2130
Yellowknife, NT X1A 2P6

April 6, 2006

Mineral Exploration – Boomerang Lake - Land Use Permit MV2006C0008

Dear Ms. McCluskie,

The North Slave Métis Alliance (NSMA) has reviewed and supports the issuance of the above-mentioned Land Use Permit to Uravan Minerals Inc. The NSMA represents Métis People indigenous to the North Slave Region and expects to be consulted when development may cause environmental impact to the land and resources within its traditional territory. The future development of Uranium deposits near the Thelon Sanctuary is a concern to our organization as the air, water and animals in the North Slave Region are transboundary, and any detrimental effects to the environment would be felt by our membership.

Sincerely,

A handwritten signature in blue ink that reads "V Meeres".

Valerie Meeres, B.Sc.
Lands & Resources