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MANITOBA DENESULINÉ

NORTH OF 60 DENE NÉNÉ LAND CLAIM NEGOTIATORS



Tel 204-337-2571
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July 29, 2013

Tannis Bolt
Assistant Technical Advisor
Nunavut Impact Review Board

RE: NIRB File No.: 13EN027; AANDC File No: N2013C0012

Dear Ms. Bolt;

Manitoba Denesuline have reviewed the aforementioned application and have the following comments and recommendations:

1. Manitoba Denesuline are concerned that the proposed timing of the project in conjunction with use of the Kiyuk Lake camp could significantly impact caribou migration through the area and general use of the area by caribou during the late August to September period. The project activities were initially proposed to occur from July to early August and would have largely avoided caribou migration through the area. With the current timing of the NIRB process and AANDC permit issuance, it is very likely a 3-4 week program would take place during late August and September. Telemetry data indicates there can be higher concentrations of caribou in the area during this time (see Attached Map). Transporting personnel and supplies daily from the Kiyuk Lake camp to the drill sites by helicopter and/or fixed wing aircraft creates the potential for significant disruption of caribou migration through the area. Manitoba Denesuline propose that the NIRB Screening report include the following recommendation as a condition of URU Metal's Land Use Permit;

the GN wildlife biologist from Arviat will be consulted before conducting drilling activities or helicopter and/or fixed wing aircraft flights. Drilling and flights will only commence once the GN wildlife biologist from Arviat is satisfied caribou are finished migrating through the area or migration will not be disrupted by drilling or flights.

2. Manitoba Denesuline propose that the NIRB Screening Report recommend that URU Metals Ltd. be required, as a condition of their land use permit, to record (time, date, location and # of animals) all sightings of caribou and other big game animals (wolves, barren ground grizzly, musk ox) encountered during the current proposed drilling program and any subsequent drilling program proposed during the period of the permit. Upon completion of this year's drilling activities, the record of animal sightings should be



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forwarded to the AANDC, Manager of Land Administration in Iqaluit so that it may be made available for Land Advisory Committee review. URU Metals Ltd should hire two members from Northlands First Nation resident in Lac Brochet as wildlife monitors.

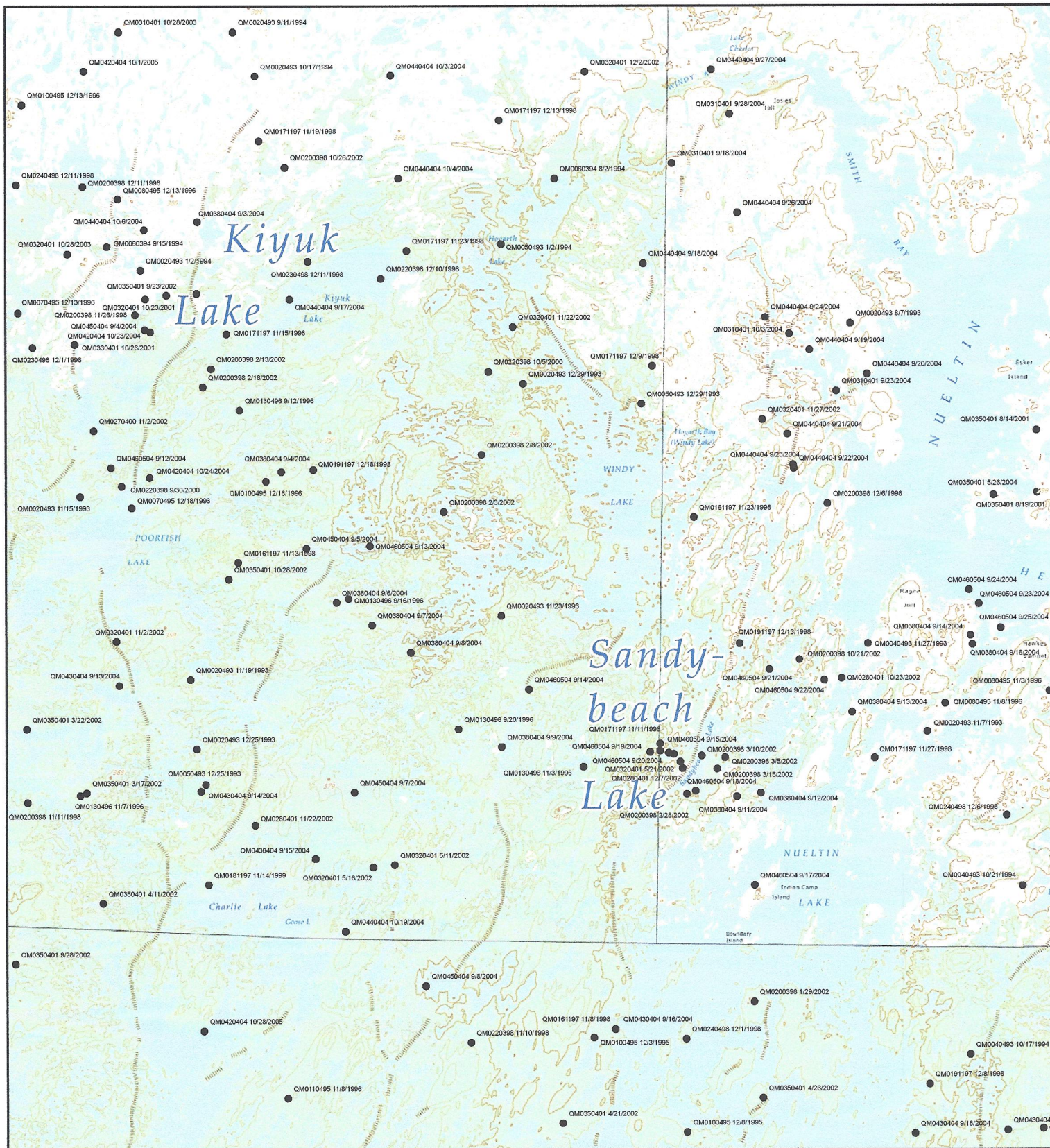
3. In April 2009, the Nunavut Department of Culture, Language, Elders and Youth (CLEY) recommended Cameco Ltd. undertake a preliminary heritage resource overview assessment for an area very similar to the one proposed for exploration by URU Metals Ltd.(correspondence attached). Manitoba Denesuline propose that the NIRB Screening Report recommend that the current URU Metals land use permit application be forwarded to CLEY to determine if the previously recommended preliminary heritage resource overview assessment is adequate for the current application or whether additional work is required. Manitoba Denesuline also request a copy of the previously recommended preliminary heritage resource overview assessment and copies of any additional reports recommended by CLEY.

On behalf of Manitoba Denesuline, I would like to thank-you for the opportunity to comment on this application. If you have any questions, please do not hesitate to call. Manitoba Denesuline request a copy of the NIRB Screening Report and subsequent completed land use permit and all conditions, once it has been issued.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Wayne Wysocki', written in a cursive style.

Wayne Wysocki
Technical Advisor, Manitoba Denesuline



Telemetry Occurrences of Qamanirjuaq Caribou 1993 - 2006

Data Source:
National Topographic Database 1:250,000 obtained from Geogratis, Department of Natural Resources Canada

Qamanirjuaq caribou telemetry data: Nunavut Department of Environment, Wildlife Research Division



2.5 5 10 15 20 Kilometers

Universal Transverse Mercator Zone 14
North American Datum 1983



Monthly Frequency of Caribou Occurrences 1993 - 2006

