



CMD 25-H9.REF12 CNSC Staff Submission

Reference Package 12 for CMD 25-H9 CNSC Staff Submission on Denison Mines Licence Application to Prepare Site and Construct the Wheeler River Project

Classification	Unclassified
Type of CMD	References
CMD Number	CMD 25-H9.REF12
Original CMD	CMD 25-H9
Public hearing date	08 December 2025
PDF e-DOC #	7605589
Summary	This document contains documents related to the Environmental Assessment process, as posted to the Canadian Impact Assessment Registry, to be placed on the Record for the proceeding.
Actions required	There are no actions requested of the Commission. This CMD is in support of the actions and recommendations set out in CNSC staff CMD 25-H9.



CMD 25-H9.REF12 Soumission par le personnel de la CCSN

Références liées 12 au CMD 25-H9 Soumission par le personnel de la CCSN la demande de Denison Mines visant à préparer le site du projet de Wheeler River et à entamer les activités de construction

Classification	Choisir un niveau de classification
Type de CMD	Références
Numéro de CMD	CMD 25-H9.REF12
CMD Original	CMD 25-H9
Date de l'audience	08 décembre 2025
Numéro e-Doc du PDF	7605589
Résumé	Ce document contient des documents liés au processus d'évaluation environnementale, tels que publiés dans le Registre canadien d'évaluation d'impact, à verser au dossier de l'instance.
Mesures requises	Aucune mesure n'est requise de la Commission. Le présent CMD appuie les mesures et les recommandations énoncées dans le CMD CMD 25-H9 du personnel de la CCSN.



CMD 25-H9.REF12

Reference Package 12 for CMD 25-H9 CNSC Staff Submission on Denison Mines Licence Application to Prepare Site and Construct the Wheeler River Project

Signed by:

X

Dana Beaton
Director General, DERPA

June 6, 2024

Robin McLeod
Prince Albert Grand Council
Chief Joseph Custer Reserve #201
2300 9th Ave West
P.O. Box 2350
Prince Albert, SK, S6V 6Z1

Sent by email: rmcleod@pagc.net

Re: Denison response to Prince Albert Grand Council comments on the draft Environmental Impact Statement for the Wheeler River Project.

Dear Robin McLeod:

Denison thanks Prince Albert Grand Council for their review and comments on the draft Denison Mines Wheeler River Project (“the Project”) Environmental Impact Statement (“EIS”). Owing to an administrative issue, Denison was not in receipt of these comments until recently. As a result, we apologize for the delay in providing a response to you.

To begin with, we noted throughout your submission that PAGC highlighted the importance of Denison working directly relevant First Nations in relation to the Project. I would like to confirm to you that, for many years now, Denison has been undertaking important work in this area with a number of interested First Nations who are represented by PAGC. For more information about all efforts in relation to those activities, section 4 of the draft EIS outlines the approach and outcomes in this regard.

As an attachment to this letter, you will find detailed answers prepared by Denison’s full technical team to the comments made on behalf of PAGC to the Canadian Nuclear Safety Commission (“CNSC”) in respect of the Project on the draft EIS, which were shared with the CNSC on March 6, 2023. Please note, the format for our responses is set out in table form, following the manner in which the CNSC directed Denison to respond to certain PAGC comments made in your submission.

We understand that the overall protection of the environment and respectful considerations and consultations with Indigenous communities is important to PAGC as we advance the Project, and can confirm that we are, and have actively worked, to be responsive to issues identified about the Project with those interested First Nations, including those raised by PAGC.

Sincerely,



Carolanne Inglis-McQuay for/

Janna Switzer
Vice President, Environment, Sustainability and Regulatory

Attach: (1) Table: Denison Responses to PAGC draft EIS Comments

Denison’s Responses to Comment from PAGC of the Wheeler River Project draft
 EIS Denison Response – June 6, 2024

Denison’s Responses to Comment from Prince Albert Grand Council (PAGC) (March 6, 2023) for the Wheeler River Project Environmental Impact Statement

Ref. No.	Source	Reference to EIS, appendix, or supporting documentation	Comment Summary (all original submissions can be found on Canadian Impact Assessment Registry reference: 80171)	Denison Response
564	Prince Albert Grand Council (PAGC) (March 6, 2023)	General Comments	<p>Overall Comments from the PAGC submission: The EIS does not address multiple issues related to ecosystems, human health, and the long-term sustainability of the Wheeler River project, particularly Indigenous concerns regarding the loss of caribou, wolverine and other culturally significant animals. There are no details on economic benefits from the mines through Indigenous partnerships, including equity-based participation in the workforce with training opportunities for Indigenous personnel to operate in management roles.</p> <p>[Additional questions on this topic directed to regulators or government entities are included in the CNSC table]</p>	<p>The EIS does not address multiple issues related to ecosystems, human health, and the long-term sustainability of the Wheeler River project, particularly Indigenous concerns regarding the loss of caribou, wolverine and other culturally significant animals.</p> <p>Denison Response: The potential effects of the Wheeler River Project on the aquatic and terrestrial environments have been comprehensively assessed in the EIS and related supporting documentation. The spatial scale is very small (resulting from ISR mining method) of 160 hectares. A conservative approach was taken in the assessment and the overall conclusion was made that there would be no significant adverse residual effects in consideration of proposed mitigations.</p> <p>The Wildlife LSA was designed to capture the majority of the Project effects. The Wildlife LSA extends beyond the Project Area of the site to include a reasonable estimation of where sensory disturbance from Project-related activities would extend and where effects on wildlife including caribou are most likely to occur. Further the Local Study Area for Indigenous Land and Resource Use (Section 11.1) is defined as the Project footprint plus the maximum combined extents of the supporting Valued Components for the Regional Study Area for aquatic, terrestrial, noise, and health as these components can affect the Indigenous resource use environment to ensure that all possible effects to resources were considered. Section 9 describes how consideration of potential effects to wildlife and wildlife habitat are considered within the EIS. In regard to caribou, Denison has developed a Conceptual Caribou Mitigation Plan based on discussions between Denison and Saskatchewan Ministry of Environment. Denison utilized Traditional Knowledge provided by Indigenous communities in the assessment and in the development of the Plan.</p> <p>A Human Health Risk Assessment (HHRA) was undertaken for the Project in Section 10. The HHRA evaluated direct exposure to constituents of potential concern (or contaminants) released to air and water, and through indirect exposure to the constituents associated with soil, sediment, and food, such as fish, wildlife, and plants. The assessment was inclusive of information based on use of traditional foods. The overall conclusion of the HHRA was that there would be no significant adverse effects to human health from the Project.</p> <p>Denison’s decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning</p>

Denison’s Responses to Comment from PAGC of the Wheeler River Project draft
 EIS Denison Response – June 6, 2024

Ref. No.	Source	Reference to EIS, appendix, or supporting documentation	Comment Summary (all original submissions can be found on Canadian Impact Assessment Registry reference: 80171)	Denison Response
				<p>Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p>There are no details on economic benefits from the mines through Indigenous partnerships, including equity-based participation in the workforce with training opportunities for Indigenous personnel to operate in management roles.</p> <p>Denison response: Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be with institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.</p>
565	PAGC (March 6, 2023)	Loss of Use and Access to Traditional Lands and Resources	<p>The EIS does not capture Indigenous Elders’ understanding of the human impact, climate change and cumulative effects on wildlife including caribou or other species at risk and the resulting impacts on Indigenous livelihoods. Denison’s EIS states that existing disturbances in the area are from exploration activities with a general description of how disturbances from these activities will be managed. PAGC does not find sufficient evidence that the affected areas can be restored to their former state and will impact woodland caribou habitats.</p> <p>PAGC Elders prioritize the removal or reduction of human disturbances to the landscape for caribou recovery and wish to avoid projects which have a significant environmental impact. PAGC elders do not want to see any animals or</p>	<p>Denison remains committed to conducting meaningful engagement with Indigenous communities potentially affected by the Project and to understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights.</p> <p>The potential effects of the Wheeler River Project on the aquatic and terrestrial environments have been comprehensively assessed in the EIS and related supporting documentation. The spatial scale is very small (resulting from ISR mining method) of 160 hectares. A conservative approach was taken in the assessment and the overall conclusion was made that there would be no significant adverse residual effects in consideration of proposed mitigations.</p> <p>The Wildlife LSA was designed to capture the majority of the Project effects. The LSA extends beyond Project Area of the site to include a reasonable estimation of where sensory disturbance from Project-related activities would extend and where effects on wildlife including caribou are most likely to occur. Section 9 describes how consideration of potential effects to wildlife and wildlife habitat are considered within the EIS. In regard to caribou, Denison has developed a Caribou Management Framework based on discussions between Denison and Saskatchewan Ministry of Environment. Denison utilized Indigenous Knowledge provided by Indigenous communities in the assessment and in the development of the</p>

Denison’s Responses to Comment from PAGC of the Wheeler River Project draft
 EIS Denison Response – June 6, 2024

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			<p>plants disappear from the landscapes they use based on their traditional understanding of the relationship between humans and nature. This impacts the ability to practice treaty rights and entitlements to the lands which impact physical and mental health and mixed economy connected to hunting and gathering.</p> <p>PAGC urges Denison to understand and take an eco-cultural approach to preserve wildlife and landscape health when planning mining operations and decommissioning processes. This should include use of Indigenous Knowledge in delineating caribou habitats despite the data and woodland caribou traditional ecological knowledge available in the report published by Mamun and Brook (2017).</p>	<p>Framework. Denison notes that the objective of Mamun and Brook (2017) was to support the provincial range planning process for conservation of woodland caribou. The range planning process for SK1 is currently underway. As needed, Denison’s Framework will be updated to be consistent with the management goals defined by ENV for SK1. Additionally, as part of its boreal caribou management efforts, the province is working with industry to develop effective and practice approaches to mitigate potential effects of activities on woodland caribou through offsetting. Denison is committed to continue to work with the province to finalize the habitat offset requirement using the province’s habitat offset calculator.</p> <p>Section 11 of the draft EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders. The assessment does not take an eco-cultural approach but rather one focused on VCs, key indicators and associated measurable parameters, which are standard in impact assessment. Mitigation to eliminate, reduce, or control potential adverse effects of the Project on Indigenous Land and Resource Use would apply to any uses proximal to the Project. Given proven mitigation is to be applied to traffic disturbances, noise, air quality, and increased competition for resources, the effects are expected to be minimal.</p> <p>Denison’s decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p>
566	PAGC (March 6, 2023)	Transportation Corridor Impacts to Lands and Resources	<p>Additional traffic and associated noise from the proposed project are a concern and PAGC requests that Denison puts a speed limit of about 70km/hour for trucks in the boreal forest where woodland caribou reside and are used by barren land caribou in winter.</p>	<p>The proposed operation is fly-in, so Project related traffic, and associated noise, to the area would only be related to deliveries of materials to and from the site. On-site staff will not have access to personal (or company) vehicles. The Project will not change public access to the area. The existing gate on Highway 914 near Cameco’s Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project.</p> <p>Section 12.3.4.2.1 of the draft EIS describes change in traffic as a result of the Project, including truck average annual daily traffic and average annual daily traffic. Given proven mitigation, as described in Section 12.3.5, to be applied to traffic disturbances and associated noise the effects are expected to be minimal. Section 11.1.5 also describes the mitigation</p>

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 EIS Denison Response – June 6, 2024

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				<p>measures to reduce the impacts of traffic and noise, among others. For example, air transportation will be used to transport most workers between the Project site and designated pick-up and drop-off points in communities and noise generating equipment will be situated behind on-site obstructions.</p> <p>In regard to caribou, Denison has developed a Conceptual Caribou Mitigation Plan based on discussions between Denison and Saskatchewan Ministry of Environment.</p> <p>Denison recognizes the level of concern regarding Project related transportation it has received through engagement activities to date and will continue to solicit input on transportation concerns as the Project moves forward. As outlined in Denison’s Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples’ connection to the land, and to minimize potential effects where possible. As an example, Section 11.1.5.3 describes that Denison will require truck traffic to slow down to 40 km/hr for a minimum of 2.5 km on either side of the ERFN and KML (Pinehouse #9) cultural camps, which are understood to occur in September and October (but may be adjusted at the communities direction)</p>
567	PAGC (March 6, 2023)	Consultation and Engagement	<p>PAGC finds that science-based models used for EIA reports put Indigenous people at a disadvantage as Indigenous communities are not involved in the collection, analysis and interpretation of data for models. Indigenous culture does not make use of models, rather, they follow natural changes and patterns which sometimes are not reflected in scientific findings.</p> <p>Requesting feedback from Indigenous communities on a report full of models prepared without Indigenous involvement has limited value as PAGC members are not fully engaged throughout the process. This approach is somewhat disrespectful to Indigenous communities as they are not part of the development process and PAGC reserves the right to reject the EIA or EIS.</p> <p>PAGC requests a commitment from Denison to get Indigenous communities involved in each</p>	<p>Denison acknowledges that Indigenous ways of knowing are distinct from western science, and have included Indigenous knowledge shared by communities in the impact assessment process. For example, Section 10.1.2 describes that Indigenous Knowledge and Local Knowledge were used to inform assumptions used in the human health risk assessment which helped identify human health receptors (i.e., people) who consume traditional foods, specifically in terms of their locations, residency times, and components of the traditional foods diet. In this instance, Indigenous knowledge was used to complement western science.</p> <p>Denison remains committed to conducting meaningful engagement with Indigenous communities potentially affected by the Project and to understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights. Through the environmental assessment process ERFN and other Indigenous communities have opted to utilize third party supports to complement their review of the EIS. Third party reviews were supported by both agreements executed between Denison and Indigenous communities, along with participant funding offered by the CNSC. Section 4 of the EIS describes the engagement undertaken with Indigenous communities and organizations.</p> <p>Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, and an example of their continued involvement from the outset to end of a process includes the commitment to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring</p>

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 EIS Denison Response – June 6, 2024

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			stage of the documentation and report preparation process.	regime, suited to each of their interests and needs, in an agreed-upon fashion. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project.
568	PAGC (March 6, 2023)	Economic Benefits, Training and Funding Opportunities	<p>PAGC request additional details from Denison regarding plans to incorporate Indigenous partnership in the economic benefit of the mines, equity-based participation in the workforce and training opportunities for Indigenous personnel to operate in management roles.</p> <p>PACG suggest arranging long-term funding for youth education in science that would prepare them for careers in biology and environmental science, which is very uncommon among Indigenous communities. Increasing Indigenous representation in science and technology, and participation in development planning is therefore a valuable long-term goal.</p>	<p>As outlined in Denison’s Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison’s business activities. Denison’s Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in the Economics section of the EIS, Residents of Saskatchewan’s North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.</p> <p>Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project. This may include initiatives associated with youth education in science if that is the interest and priority of the communities. Training could also include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.</p>

Meeting Notes

Athabasca Basin Tour with the Ya'thi Nene Lands and Resources

Stony Rapids Community Meeting

June 10, 2024 - 12:30 pm

1. Agenda

Introductions and Opening Prayer

Lunch

Presentations and Questions - Denison Mines

SK ENV Environmental Assessment Process

Next Steps - Ya'thi Nene Lands and Resources

2. Attendees

YNLR: Garrett Schmidt, Steven Foti, Celeste Robillard

SkMOE: Jeff Dereniwski, Brittany Neumeier

Denison: Janna Switzer, Carolanne Inglis-McQuay, Chad Sorba, Brett Boechler, Brianne England

3. Action Items

YNLR to get contact information for Doris from Stony Rapids

4. Discussion Summary:

- How can we help you help us? Stony Rapids wants to have a relationship with Denison Mines in the future to allow their young people to have a better future.
- Our kids are very intelligent and could make their way if they have the proper training.
- Questions about the new technology and training students to be prepared for success in future roles.
- This is good, you are not taking up a lot of land and you are just drilling some wells.
- We just want the young people to understand what you are bringing to us, and we need to teach our students how to be prepared for future employment.

- We want the young people to be doing the qualified technical jobs and not just shoveling and doing the hard labor, we are tired of doing that work and want the better paying qualified jobs.
- In 5 years, some of our people could be ready for work with Denison Mines
- Young people look to leadership to give them advice on where/what to study.
- Communication is the key, what if you leave today and we never hear about it again until the day it happens.
- Athabasca owns Team Drilling, could look at Athabasca basin drilling capacity, because a relationship is the most important thing (stressing that again)
- What can you do to help us help you? To do a great job at the end of the day.
- Technology new to the region, what kind of technology is that? Is this similar to Cigar Lake? Brings up a liquid/solid/slurry? Are you going to have technical jobs that you are going to employ from the Athabasca basin? Or will you hire the technical people from far away? I see there is less jobs, so we want to make sure our youth are ready to be part of it.
- How does this project benefit the community? How long will the project operate?
 - 2 years construction and 10 years mine life.
- What is the grade?
 - 19% uranium
- Will you share your revenue with the Athabasca community?
 - We are actively working with YNLR on it together.
- Lots of mines develop in our region and we are not shared revenue from those? So, whatever you are taking out of our land we would like to be part of it in revenue sharing. Because you will need our authority to go digging and taking out resources. Look at our streets and roads, we need more funding for roads in the area.
- Air travel is very expensive, we need road infrastructure, roads are in terrible condition.
- If we had better investment from industry, we need to benefit.
- We are getting all the people from southern areas coming in for fishing and tourism, we want them to know that someone cares about their community.
- We have to have a relationship here and should be acting as a unit, we are supposed to be the hub of the north, the place to be, Athabasca Basin has the richest uranium deposits in the world, people should have a better quality of life.
- What will the mine life be?
 - Wheeler River has a 10-year mine operating life (19% grade), THT will be a 6-year mining life (2% grade)

- What is the difference in grade from Cigar Lake? Why would you mine it if it's such a low grade?
- What is the cost to start the mine? What is the benefit of this mining method? Will other people be using this mining method in the future? Should we be asking Cameco to mine with this technology? Is this new?
- How can we get our grade 12's into the right training programs?
- How can we keep our kids in school? Our school only goes up to grade 9. We have done programming to fund students to continue through to grade 12. Now that we have mining companies coming into our territory why wouldn't we have our young people benefit from these projects.
- Find them, recognize them, give them the rewards,
- Training for trades was in the community in the 1980's, heavy duty mechanics, electricians, heavy equipment operators.
- Planning for education facilities to be built throughout the Athabasca region, Stony Rapids should be getting the biggest school.
- Who is your contact for employment?
 - YNLR office in Black Lake.
- 27 companies within the Athabasca region, health, catering, administration, flight planes, drilling.
- Elders, young people, baby boomers want to look to the future to have safe drinking water, safe places to go for our children and their families.
- It would be good not to use a percentage of communities, each community gets so much from the companies, we have less population so we get less right, we shouldn't use that it should be all equally. A lot of funds go through population-wise and a lot of times we don't get enough funding when allocated that way.
- We can't make ends meet with what we get in the community. 80% First Nations, 10% non-Indigenous, 10% Metis. Stony Rapids is non-reserve, Stony Rapids would like to see the road to Points North improved. 2-hour drive takes 8 hours to drive on the condition of the roads.
- We want the best for our communities, down south has the best roads, it isn't fair that northern communities don't get any attention or infrastructure funding.
- People in these areas struggle with addictions and it needs attention.
- This is a good way to do the mining, this is a good method. If I have to sign anything I will because that's how the mining should work. Why would I stop anything because that's the jobs for our people. We don't want them to be shoveling, we want them to have careers that they can progress in.
- We want to grow; we see other communities grown and we have been getting smaller. Stony Rapids population approx. 400. Smaller than some nearby reserves and receive less portion of funding because of that.

- Elder: A lot of elders in the community have passed on. Talking about the mines, what is it going to do for our people and communities? We don't get anything from the mine projects. All the revenues and the government in Ottawa, we are living in an isolated area, we don't have a decent road, how much money has been spent for the many years. Now we have a big hospital, and the ambulances can't drive on the roads. Why don't the government and the mines do something about the roads before going forward with the mine.
- Exploration on a trapline, plane and operations have started again. Helicopter have scared all the animals away which makes it difficult to trap.
- Hardly anyone from the community is working in the mines near Points North.
- Band council involvement in the 1990's, CanAlaska made a partnership with the band and had a 50/50 agreement for the mine.
- We are suffering and don't live in a decent country, isolated area without a decent road. Every vehicle you see is cracked and broken because of the condition of the highways.
- Minister of Transportation from Ottawa came to the community to see the condition of the roads.
- You people come here for money and don't care about the community, this is what I learned from elders. Money talks but the government doesn't do anything about it. People only come to the community for money and minerals. That is not right the way the government is treating us. We don't get anything out of the mine companies and worried the same thing is going to happen.
- We don't have anyone to represent us outside of the community.
- A new mine north of Black Lake, the mine at Patterson Lake close to Cluff Lake.
- When things like this happen, we find out years before but then they don't follow up when the plans are being made. Elders are not being listened to.
- Mining companies pay huge taxes to the government, if you can provide us with infrastructure, it could be a tax write-off with the government.
- Person with Metis society and is familiar with duty to consult letters. Why aren't all people getting copies of the letters? Do they share the letters with the people, no. We need better communication. It feels like nobody is telling us things and that's why people feel uptight.
- Curtis Fiske - Stony Rapids Metis local president.
- If funding is based on per capita, it won't benefit Stony Rapids. Who decided YNLR would represent the 7 communities?
 - Community leadership back in 2016 and 2017.

Meeting Notes

Athabasca Basin Tour with the Ya'thi Nene Lands and Resources

Black Lake Community Meeting

June 10, 2024 - 6:30 pm

1. Agenda

Introductions, and Opening Prayer

Supper

Presentations

Ya'thi Nene Lands and Resources (YNLR)

SK Ministry of Environment

Denison Mines

Next Steps - YNLR

2. Attendees

YNLR: Garrett Schmidt, Steven Foti, Celeste Robillard

SkMOE: Jeff Dereniwski, Brittany Neumeier

Denison: Janna Switzer, Carolanne Inglis-McQuay, Chad Sorba, Brett Boechler, Brianne England

3. Action Items

N/A

4. Discussion Summary:

- Freezing orebody, 400 m below, has that been done anywhere else in Canada, bringing liquids up to surface will that be discharged to surface or back down the wells?
- Leaching of the mining solution?
- How long will the freeze wall be in place? How long will the project be operating?
 - 10-year mine life
- Interest in education and training opportunities for youth to be ready for opportunities with Denison Mines.

- In the past they were told by mining companies there would eventually be jobs, but when things got going the community was overlooked.
- Reason why attendee brought up the previous argument, there was an instance in the past where a job was meant for Athabasca but most of the jobs went to people from the west side. There were also jobs that went to southern people.
- We want employment in our communities. Employment will help to solve a lot of issues that communities are struggling with.
- Far north needs to be recognized for employment. Would like to see more jobs at the Wheeler Project. Keep the Nuhenéné in mind.
- We should look at 80/20.
- We need to train grade 12 graduates to help them stick to a job.
- If northern people are not properly trained, they lose their job after a few years.
- Train the northern people and then we'll see how committed Denison is to the communities.
- We want our youth to be qualified for technical jobs and careers, not just the labourers.

Meeting Notes

Athabasca Basin Tour with the Ya'thi Nene Lands and Resources

Uranium City Community Meeting

June 11, 2024 - 6:30 pm

1. Agenda

Introductions, and Opening Prayer

Supper

Presentations

Ya'thi Nene Lands and Resources (YNLR)

SK Ministry of Environment

Denison Mines Q&A

Next Steps - YNLR

2. Attendees

YNLR: Garrett Schmidt, Steven Foti, Celeste Robillard

SkMOE: Jeff Dereniwski, Brittany Neumeier

Denison: Janna Switzer, Carolanne Inglis-McQuay, Chad Sorba, Brett Boechler, Brianne England

3. Action Items

N/A

4. Discussion Summary

- Would like the hydraulic reports and what PSI will be needed to drill and mine the deposit.
- Midwest project drained all the lakes, Denison project may be close to that.
- Is the mining method borrowed from Europe? They don't have the same sandstone there.
- Have sinkholes/subsidence been observed where ISR mining methods have been used in Europe or other countries?
- How are mining fluids injected into the wells?
- When you are doing this stuff, you are diluting your water. Path of least resistance is where the pressure is going to go.

- I hope your freezing works. I like your system. Your static is based on what level? 200-400 m?
- What do the freeze walls do for the project?
- Are the freeze walls keyed into the basement rock?
- How are you transporting the product to your processing plant?
- Question about leaching and how it can encroach outside of the mining area to the surrounding groundwater.
- Ceiling over the mining area could be made up by sedimentary rock or weaker rock. Risk that pressure of pumping will force fluids upwards into the shallow groundwater.
- How thick is the freeze wall once it's in place?
- How do you monitor the freeze wall, with wells on either side?
- How far apart are monitoring wells spaced?
- Worried about potential long-term consequences from high pressure pumping mining method.
 - Designed to be 60-90 PSI.
- What kind of volumes are you pumping for the brines?
- When you are all done with the mine how do you ensure the groundwater reaches a neutral pH? Do you pump in more fluids?
- How much iron radium solution will be produced as a result of the ore processing?

Meeting Notes

Athabasca Basin Tour with the Ya'thi Nene Lands and Resources
Hatchet Lake Dene Nation / Wollaston Post Community Meeting
June 13, 2024 - 6:30 pm

1. Agenda

Introductions and Opening Prayer

Supper

Presentations and questions - Denison Mines

SKMOE Public and Indigenous Participation in EA Process

Next Steps - Ya'thi Nene

2. Attendees

YNLR: Garrett Schmidt, Steven Foti, Celeste Robillard

SkMOE: Jeff Dereniwski, Brittany Neumeier

Denison: Janna Switzer, Carolanne Inglis-McQuay, Chad Sorba, Brett Boechler,
Brienne England

3. Action Items

Include CNSC staff (Jes Way, Ryan Froess) in future meetings like this. Action for both YNLR and Denison.

4. Discussion Summary:

- Can you clarify that Denison needs to get provincial and federal approvals before they can start mining?
- Can you clarify, when you get permits approved for operation and the information is distributed to communities. How will you distribute the information to these communities who speak Dene. How is our input going to be considered? How do you ensure that the locals get a voice in it?
- In the future, consulting needs to be done in a manner that our people can understand it. Most people in our community communicate verbally in Dene but we don't all know how to read in Dene. Written materials should be provided in English and Dene so that more people can understand it.

- Can you explain about the depth at 200 m, put it into perspective? How many feet is that?
- A small footprint of the project is ok, but the community looks at the new disturbance along with a lot of other activities that are happening on the landscape. Cumulatively, the footprint of mining is not small to communities.
- Not clear on the leaching process? What do you do? Pumps and pipes? What do you add to leach the uranium?
- Will those chemicals be able to escape out of the freeze wall?
- So, this method is used throughout the world? Have there been any malfunctions in the reclamation? What happens to the material that's down there? What potential accidents could happen during operation?
- So, the freeze wall works like a big tank to separate the mining chemicals from the groundwater. Is there a chance for the mining fluids to escape if the freeze wall fails?
- Mining will be done in phases. What do you do with the freeze wall when you move on to future phases?
- Will the freeze walls of earlier phases stay frozen while later phases are mined? In the long run will anything escape to the environment?
- So, there is no way that it would affect the environment in the future, because of the freeze wall?
- If you are pumping all that sulfuric acid into the ground what are the chances that vegetation will ever be there again?
- Theoretically this looks like a good method, but it was tried at McClean Lake, and it didn't work because of our harsh environment. What is the guarantee that we have that it's not contaminated forever? Once something has been destroyed by sulfuric acid you can't reclaim it.
- What happens to all the sulfuric acid that didn't do what it's supposed to do.
- What is the guarantee of the new mining method because it hasn't worked in the past?
- ISR mining works because of the geology (sandstone and basement rock)
- How will you protect against radiation from escaping the leaching area?
- The ore being pumped out, will it be in the building or in pipes?
- In other milling operations, the HVAC units are constantly running because of the chemical processes. When you have sulfuric acid leaching the uranium there are a lot of gases produced. What will happen with the produced gases underground?
- Once the project is over how will the mining area be cleaned up underground?
- Do you have a plant to treat the water?

- Community doesn't like to receive information through a website, the community would prefer in person meetings to receive information.
- The fishing economy was negatively impacted by the mine reporting on the website. Publicizing it for the world without the community being aware is not a good thing. The mines never asked us how we can help you after the fishing economy has been negatively impacted.
- We have not been formally consulted; we have only been given information.
- The water quality is sufficient for provincial and federal legislation, but it isn't satisfactory for the fishing/food industry standards.

From: [Ty Roberts](#)
To: [Carolanne Inglis-McQuay](#)
Subject: [**]Missinipe Land Use Plan
Date: Wednesday, June 12, 2024 3:56:25 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[Misinipiy \(Missinipe\) Land Use Plan.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Carolanne,

Please distribute to your colleagues who presented today at the LLRIB Traditional Lands & Resources Advisory Committee.

Thanks,

Ty Roberts, B.S.A, PAg.
Reserve Lands Manager

Lac La Ronge Indian Band
Lands & Resources

PO Box 480 • La Ronge, SK • S0J 1L0

306-425-2183

306-425-2170

ty.roberts@llrib.ca



From: [Engagement Records](#)
To: [Ty Roberts](#)
Subject: RE: [**]Missinipe Land Use Plan
Date: Tuesday, June 18, 2024 10:30:00 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[DMC Properties vs Misinipiy Integrated Land Use Plan.pdf](#)

Hi Ty:

Thanks for this email and the information attached.

As I understand, our team committed to further review the alignment of Denison's project locations relative to the Misinipiy Integrated Land Use Plan (2012). We have carefully reviewed the information contained within the Misinipiy Integrated Land Use Plan (2012) that you have provided in this email correspondence. We can confirm that this is the same report and associated information we have used in relation to Lac La Ronge Indian Band since the beginning of the Wheeler River Project, in 2019. For complete transparency to you and the Committee, we have georeferenced Map 1 as shown on page 84 of the Misinipiy Integrated Land Use Plan (2012) and have attached it accordingly. The result shows that Phoenix, Wheeler River, and all of Denison's properties fall outside both the Misinipiy Planning Area, and the Lac La Ronge Indian Band Traditionally Occupied Territory, as depicted in Map 1 of the referenced document.

We are committed to working with LLRIB in a manner that reflects our presence in northern Saskatchewan and our commitment to Indigenous communities, and are happy to demonstrate our continued commitment to LLRIB through the increasing use of LLRIB-owned businesses, such as our recent switch to Athabasca Catering at the Wheeler River Property, as well as our substantive contribution to the Tony Cote Games in August and our contributions to the Heritage Fund – as had previously been identified to us as important by the Committee in relation to the Wheeler River Project.

I can confirm to you that we understand LLRIB's interest in formal relationships for activities which occur within LLRIB Traditionally Occupied Territory, and can commit to you that, should any future activities for Denison occur within this important area, we will proactively reach out to LLRIB to discuss accordingly.

Thank you again for inviting us to your meeting, and I hope you have a good week.

Carolanne

Carolanne Inglis-McQuay

Director, Corporate Social Responsibility

t: 306-652-8200 x 128 | f: 306-652-8202

345 4th Avenue South

Saskatoon, SK, Canada, S7K 1N3



TSX: DML | NYSE MKT: DNN

www.denisonmines.com

From: [Ty Roberts](#)
To: [Engagement Records](#)
Cc: [Ashley Carlson](#)
Subject: RE: [**]Missinipe Land Use Plan
Date: Tuesday, June 18, 2024 11:56:34 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image006.png](#)
[image008.png](#)
[image010.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)

Hello Carolanne,

Thank you for your email. I understand that Denison is firm in its position that it is not operating within Lac La Ronge Indian Band's traditional territory. Section 4.6 of the MILUP discusses the boundary of the planning area and that future clarification of the boundaries of each respective nation will be needed. Unfortunately, the MILUP has not been reviewed or amended since it was finalized in 2012. So, we haven't been able to update our current boundary but have done so internally. Further, I confirm that LLRIB considers Key Lake and McArthur River within our traditional boundary and Denison's Wheeler River Project. I would also like to mention that LLRIB greatly appreciates Denison's contributions to LLRIB-owned businesses and community events. The intention of this conversation and request for a formal relationship through a collaboration or impact benefit agreement is to solidify the partnership between Denison and LLRIB. It is our intention to work with you and your organization to promote sustainable mining practices within LLRIB territory and northern Saskatchewan.

I'm looking forward to talking more about this as we build this relationship.

Regards,

Ty Roberts, B.S.A, PAg.
Reserve Lands Manager

Lac La Ronge Indian Band

Lands & Resources

PO Box 480 • La Ronge, SK • S0J 1L0

306-425-2183

306-425-2170

ty.roberts@llrib.ca



From: Engagement Records <engagement.records@denisonmines.com>

Sent: June 18, 2024 10:31 AM

To: Ty Roberts <ty.roberts@llrib.ca>
Subject: RE: [**]Missinipe Land Use Plan

You don't often get email from engagement.records@denisonmines.com. [Learn why this is important](#)

EXTERNAL EMAIL: Be suspicious of content, links, and attachments.

Hi Ty:

Thanks for this email and the information attached.

As I understand, our team committed to further review the alignment of Denison's project locations relative to the Misinipiy Integrated Land Use Plan (2012). We have carefully reviewed the information contained within the Misinipiy Integrated Land Use Plan (2012) that you have provided in this email correspondence. We can confirm that this is the same report and associated information we have used in relation to Lac La Ronge Indian Band since the beginning of the Wheeler River Project, in 2019. For complete transparency to you and the Committee, we have georeferenced Map 1 as shown on page 84 of the Misinipiy Integrated Land Use Plan (2012) and have attached it accordingly. The result shows that Phoenix, Wheeler River, and all of Denison's properties fall outside both the Misinipiy Planning Area, and the Lac La Ronge Indian Band Traditionally Occupied Territory, as depicted in Map 1 of the referenced document.

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I can confirm to you that we understand LLRIB's interest in formal relationships for activities which occur within LLRIB Traditionally Occupied Territory, and can commit to you that, should any future activities for Denison occur within this important area, we will proactively reach out to LLRIB to discuss accordingly.

Thank you again for inviting us to your meeting, and I hope you have a good week.

Carolanne

Carolanne Inglis-McQuay

Director, Corporate Social Responsibility

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From: [Janna Switzer](#)
To: [Carolanne Inglis-McQuay](#)
Subject: Fwd: [**]Response to Denison to YNLR letters dated 5 and 30 April 2024
Date: Wednesday, June 19, 2024 2:52:32 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[YNLR response Denison"s letters of 5 and 30 Apr 24 FINAL.pdf](#)
[Appendix 1 a.pdf](#)
[Appendix 1 b.pdf](#)

Sent from my Bell Samsung device over Canada's largest network.

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Sent: Wednesday, June 19, 2024 2:31:31 PM
To: Janna Switzer <jswitzer@denisonmines.com>
Cc: Garrett Schmidt <garrett.schmidt@yathinene.com>; Dereniwski, Jeff ENV <jeff.dereniwski@gov.sk.ca>; Scott, Ken ENV <Ken.Scott@gov.sk.ca>; Froess, Ryan <ryan.froess@cncs-ccsn.gc.ca>; Way, Jessica <jessica.way@cncs-ccsn.gc.ca>; Beaton, Dana <Dana.Beaton@cncs-ccsn.gc.ca>; Kwamena, Nana-Owusua <nana-owusua.kwamena@cncs-ccsn.gc.ca>; Pollock, Brady ENV <brady.pollock@gov.sk.ca>
Subject: [**]Response to Denison to YNLR letters dated 5 and 30 April 2024

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Jana:

Please find attached the subject letter and the attachments a. and b. to Appendix 1 of subject letter

Respectfully

Bruce Hanbidge
Strategic Advisor | Ya'thi Néné Land and Resource Office



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19 June 2024

Janna Switzer
Vice President Environment Sustainability & Regulatory
345 4th Avenue South
Saskatoon, SK S7K 1N3

Dear Janna:

This letter is in response to your emailed letters of 5 and 30 April 2024. However, as the letters between YNLR and Denison have become overlapping and potentially confusing to anyone that may review this correspondence, it is necessary to make some restatements for future clarity:

1. The basis for this discussion between Denison and YNLR:
YNLR and Denison are in the iterative review period of the EIA process for Denison's Wheeler River project. CNSC has reviewed YNLR's initial comments on Denison's EIS and noted that a number of YNLR concerns are unaddressed by Denison's EIS. Therefore, CNSC has directed YNLR and Denison to undertake further discussion to try and resolve YNLR's concerns. In response, Denison has produced a revised EIS and has been in communication with YNLR with the intent of both parties cooperatively resolving YNLR concerns before the commencement of the public review stage of the EIA process for Denison's Wheeler River project.
2. The current status of the iterative review between Denison and YNLR is:
 - a. YNLR has provided two responses as part of the iterative stage we are in. Those responses are dated 02 February 2024 and 13 March 2024 (attached as Appendix 1);
 - b. Denison has sent two emails to YNLR, dated 5 and 30 April 2024 (attached as appendix 2) where they requested a further response from YNLR as to any changes that may have occurred in YNLR's responses as stated in their letters dated 02 February 2024 and 13 March 2024; and
 - c. the stated reason why Denison is asking for a further response from YNLR is because Denison wants to know if YNLR's responses to their EIS and revised EIS may have changed as a result of discussions in two recent meetings:
 - i. a meeting on 22 Feb 2024, between YNLR staff members and Denison staff members and their Ecometrix contractor to review YNLR responses to the Denison's EIS and revised EIS; and
 - ii. A meeting on 12 April 2024 of the YNLR Board of Directors.



Therefore, in light of the above restatements for future clarity: I can confirm that the YNLR responses to the Denison EIS and revised EIS as stated in their letters of 02 February 2024 and 13 March 2024 remain unchanged as of the date of this letter.

The balance of this letter will now address the points 1) to 5) in Denison's letter to YNLR of 5 April 2024. Denison's comments are in green, YNLR responses are in red

1) No further comment from YNLR – we note that Ref. #'s 375 to 378, 382, 385, 392, 395, and 398 to 438) have no further comment from YNLR related to these. We assume that our responses to these comments are deemed complete by YNLR and will proceed on that basis unless otherwise advised.

YNLR Response: I do not know what Denison means by the phrase “deemed complete”. YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remain unaddressed.

2) Collaboration on Monitoring Plans and Programs (Ref. #'s 379, 380, 381, 383, 384, 386, 387, 388, 389, 390, 393, 394, 396, 397): As an outcome of our meeting on February 22, 2024, where Denison and YNLR discussed YNLR's desire to be involved in monitoring plan development, Denison provided a follow up email and document from the draft Wheeler River Environmental Impact Statement (EIS) called Summary of Monitoring. The document outlines the conceptual monitoring program for all and stages of the project and how they tie to each Valued Component assessed in the EIS. Denison further committed, in that email, to work with the YNLR in a manner that has been requested of us, which includes sharing further information about monitoring plans as they are developed through the permitting and licensing process. Also in the February 22 meeting, it was noted by YNLR's consultants that the areas of immediate interest were surface and groundwater, aquatics, wildlife and Woodland Caribou monitoring. Denison acknowledged the request made in the meeting and further acknowledges the request in the March 13th email, where all monitoring plans have been requested by YNLR. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans, procedures and work instructions that will be developed, it would be helpful for YNLR to identify which areas monitoring are of interest from which we can then together establish a process and discuss further details about next steps.

YNLR response: While encouraging, point 2) still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be “involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR's concerns stated in



YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.

- 3) Confidence in the freeze-wall technology (Ref. # 381): This comment received from YNLR on March 13, 2024, highlight YNLR's perspective on groundwater monitoring requirements in association with the freeze wall. This is accompanied by doubts of freeze wall efficacy and the manner in which this was analyzed, in which YNLR has stated, "independent assessments are required." To this end, Denison would be pleased to coordinate a meeting between YNLR, and the technical expert Denison utilized to design the freeze wall and confirm its effectiveness for the geological and hydrogeological conditions for an ISR mine at Wheeler River. Greg Newman from Newman's Geotechnique is a leading expert on the currently deployed freeze wall technology used at Cigar Lake and McArthur River. Mr. Newman would be able to respond to technical questions posed by YNLR about the freeze-wall technology, which could be the most effective means for YNLR to seek information about the areas of concern with respect to the freezing technology.

YNLR Response: YNLR appreciates the offer of Denison's Technical expert to brief YNLR on their concerns with freeze-wall technology. Unfortunately, Denison's freeze-wall technical expert is no more independent that Denison's Cumulative Effects technical expert, that YNLR staff spoke to on 22 Feb 2024. Hence, YNLR's concerns as stated in their response remains. Going forward on this item, YNLR will engage with CNSC for access to an independent technical expert on freeze-wall technology.

- 4) Caribou Offsets, Preliminary Decommissioning Plan (Ref. # 380, 387, 388, 389): YNLR has shared comments with respect to Woodland Caribou offsets, including those related to the definition of offsets, timing, and mitigation measures as part of present-day mitigation measures for the Project, and should be applied in advance of decommissioning. YNLR has also requested to see the pre-decommissioning monitoring plan for containment releases. As an outcome of our meeting on February 22, 2024, Denison provided a follow up document called Summary of Monitoring which outlines the Project's commitments for monitoring programs for all phases of the project from pre-construction to post decommissioning. Details of monitoring will be developed prior to, and applicable for each phase of the Project, including decommissioning. Denison has also provided YNLR with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions in as more details are developed for that plan. Further, as part of the February 22, 2024 email from Denison to YNLR, Denison included the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. We welcomed feedback on the Draft Caribou Management Framework and remain open and willing to receive feedback on this plan.



YNLR Response: YNLR has provided its responses on caribou offsets and other aspects of caribou restoration and mitigation planning in the responses contained in their letters of 02 February 2024 and 13 March 2024. The concerns expressed in those responses remain valid and unaddressed.

YNLR did request from Denison, in their meeting of 22 Feb 2024, specific information as to where their caribou offsets are located and what was the information and methodology used to determine these offsets, however, Denison declined to provide this information. Additionally, YNLR is also on record with CNSC and Denison (see attached letters at appendix 3) that there is a divergence of opinion of the results of the YNLR and Denison Cumulative Effects analysis. Given that the results of the CE analysis is the basis for how much land, suitable for caribou, is required for offsetting: YNLR's interest in the details of Denison's caribou offset plan is a valid concern (see Appendix 3 for a review of YNLR's GIS based Method for Assessing Cumulative Environmental Effects).

Respecting preliminary decommissioning plans: decommissioning plans are based on the extent to which restoration and offsetting are carried out prior to decommissioning, therefore while their receipt from Denison is appreciated any conclusions that can be determined from this plan is incomplete without the former requested information on offset plans. Therefore, YNLR concerns stated in their comments remain valid and unaddressed.

5) Traditional Knowledge and Groundwater Monitoring (Ref. # 381): With respect to Denison's use of such a statement in relation a groundwater monitoring plan, YNLR has shared their perspective on traditional knowledge, stating that "TK will have no input into ground water contamination until health risks are noted decades or centuries later." To this end, Denison would like to clarify that the current rigorous groundwater modelling does not indicate there will be groundwater contamination nor health risks from the Project. The groundwater monitoring program will be robust and meet all regulatory standards for the type of mining proposed for the Project. Further, Denison would like to note that consideration of local and traditional knowledge in all facets of the Wheeler River Project will be guided by local and traditional knowledge holders to the extend they wish to share information in relevant areas. Traditional knowledge may or may not be relevant to groundwater monitoring results, but it may have relevance to the considerations in the planning for such monitoring, as an example.

YNLR Response: Denison's above statement in point 5) is a reassertion of their comment addressed by YNLR in their letters of 02 February 2024 and 13 March 2024. Therefore, YNLR's concerns as to their involvement in monitoring, remain valid and unaddressed.

This letter addresses Denison's requests in their letters of 5 and 30 April 2024, and it concludes YNLR's responses to Denison's EIS and revised EIS. For greater certainty: YNLR's concerns, as stated in their letters to Denison dated 02 February 2024 and 13 March 2024 and reiterated and further clarified in this letter, remain unaddressed.



Concerning further discussion on YNLR's concerns with Denison's EIS and revised EIS: YNLR remains at the table and responsive; if Denison has any further comments of substance to address YNLR concerns; or, if there is any further direction from CNSC in this matter.

Respectfully

A handwritten signature in blue ink that reads "Bruce Hanbidge". The signature is fluid and cursive.

Bruce Hanbidge
Strategic Advisor
Ya'thi Néné Land and Resource Office



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(F) 306-802-4895
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Appendix 1: YNLR emails to Denison dated 02 February 2024 and 13 March 2024

Appendix 2: Denison to YNLR emails dated 5 and 30 April 2024

Appendix 3: A GIS based Method for Assessing Cumulative Environmental Effects within the Athabasca Basin of Nuhenéné

cc:

Garrett Schmidt, Exec Dir, Yathinene Lands and Resource Office

Jeff Dereniwski, Senior Environmental Assessment Administrator, Applications, Environmental Assessment and Stewardship Branch, Saskatchewan Ministry of Environment

Dr Ken Scott, Senior Environmental Assessment Administrator, Applications, Environmental Assessment and Stewardship Branch, Saskatchewan Ministry of Environment

Ryan Froess, Senior Advisor/Indigenous and Stakeholder Relations Division, Canadian Nuclear Safety Commission



Jessica Way, Environmental Assessment Officer, Canadian Nuclear Safety Commission
Dana Beaton, Director General, Directorate of Environmental and Radiation Protection and
Assessment, Canadian Nuclear Safety Commission, Dana.Beaton@cnscccsn.gc.ca
Nana Kwamena, Director, Environment Review Division, Canadian Nuclear Safety
Commission nana-owusua.kwamena@cnscccsn.gc.ca
Brady Pollock, Executive Director, Environmental Assessment and Stewardship Branch,
Saskatchewan Ministry of Environment, Email: brady.pollock@gov.sk.ca

From: [Janna Switzer](#)
To: [Bruce Hanbidge](#)
Cc: [Garrett Schmidt](#); [Dereniwski, Jeff ENV](#); [Scott, Ken ENV](#); [Froess, Ryan](#); [Way, Jessica](#); [Beaton, Dana](#); [Kwamena, Nana-Owusua](#); [Pollock, Brady ENV](#)
Subject: RE: [**]Response to Denison to YNLR letters dated 5 and 30 April 2024
Date: Friday, June 28, 2024 9:22:32 AM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
[20240628-LTR-DEN_YNLR-ResponseJune19YNLRLtr.pdf](#)

Good day Bruce,

Please see Denison's attached letter in response to the June 19, 2024 correspondence from YNLR.

Kindly,

Janna

Janna Switzer

Vice President, Environment Sustainability & Regulatory

t: (306) 652-8201 x107 | c: (306) 380-7239 | f: (306) 652-8202

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Bruce Hanbidge
Strategic Advisor
Ya'thi Néné Land and Resource Office
335 Packham Avenue Unit 100
Saskatoon, SK S7N 4S1

June 28, 2024

Re: Response to Ya'thi Néné Land and Resource Office Letter Dated June 19, 2024

Dear Mr. Hanbidge,

We write in response to your letter dated June 19, 2024, and the ongoing engagement between Denison Mines Corp. (Denison) and the Ya'thi Néné Land and Resource Office (YNLR) in respect of the Wheeler River Project (the Project) and its draft Environmental Impact Statement (EIS).

We are thankful for your comments on the EIS and we are encouraged by the continued engagement between the YNLR and Denison. Denison looks forward to advancing its relationship with the YNLR and remains committed to developing the Project in a manner respectful of Athabasca Denesų́liné's Traditional Knowledge and values.

In order to place our response in context, below we set out an overview of the history of engagement between Denison and the YNLR in respect to the EIS. We then respond to the YNLR's most recent letter dated June 19, 2024.

Overview of EIS Engagement between Denison and YNLR

In November 2022, the Canadian Nuclear Safety Commission (CNSC) initiated the technical review of the EIS. YNLR was invited to participate in the review process and on March 4, 2023, YNLR sent a list of issues and concerns in relation to the EIS to the CNSC. These comments were shared with Denison, following which Denison met with YNLR on July 18, 2023 to discuss concerns raised about the EIS.

On July 20, 2023, the YNLR sent Denison a letter requesting Denison provide written responses to the comments and questions you raised in the YNLR's March 4, 2023, response.

YNLR's March 2023 comments and Denison's response

Denison worked diligently to respond to the YNLR's request for a written response to your March 4, 2023, comments. On November 23, 2023, Denison sent the YNLR a written response which addressed each of the sixty-four comments provided by the YNLR. Further, Denison revised its draft EIS to address the concerns raised by the YNLR, as appropriate.

The following is a summary of key issues as provided in the YNLR's March 4, 2023, comments, and Denison's November 23, 2023, response and revised draft EIS.

The YNLR commented on the Project's utilization of water and expressed concern in relation to its potential effect on the local stream flow rate, which was estimated to be at less than three percent. Denison responded to this concern by revising the EIS and committing to conduct hydrological monitoring in the Project area.

The YNLR commented that predictions for Project effects may fall short and, as a result, there is a need for close collaboration with Indigenous Peoples. Denison committed to ongoing engagement with Indigenous Peoples, and explained that the details of follow-up and monitoring plans will be prepared in consultation with Indigenous Peoples.

The YNLR expressed apprehension in respect to fish habitat and health and you noted that the YNLR expects to be involved in the monitoring of fish resources. Denison committed to collaborating with Indigenous communities in respect to environmental monitoring regimes. Denison noted it will share information about fish and fish habitat and invited the YNLR to participate in the development of a monitoring program.

You shared that the YNLR was disappointed that Athabasca Denesųłiné communities were not considered to be an Indigenous Community of Interest in the EIS, and that Hatchet Lake First Nation – a member of the Athabasca Denesųłiné communities – is located near the Project. Denison responded by acknowledging Hatchet Lake First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project and, as a result, amended the EIS to recognize Hatchet Lake First Nation as an Indigenous Community of Interest.

Additionally, the YNLR expressed concern in respect to the Project's potential effects on the local Woodland Caribou population. In response, Denison drafted a memorandum for the YNLR which responded to the YNLR's concerns and detailed Denison's caribou mitigation plan. Further, Denison stated its commitment to continue to engage with the YNLR on this topic.

In light of the exchange summarized above, Denison considers that it provided a comprehensive, good faith response to the matters raised by YNLR in March 2023.

YNLR's February and March 2024 comments, and Denison's response

On February 2, 2024, the YNLR provided Denison with a comment letter responding to Denison's November 23, 2023, written responses.

A meeting was held on February 22, 2024, in which Denison and the YNLR discussed Denison's November 23, 2023, responses and outstanding YNLR concerns in respect to the EIS. During the meeting, you shared that it is YNLR's desire to be involved in all monitoring plan development in the permitting and licensing processes. In response to this request, Denison shared documentation outlining, at a conceptual level, the proposed monitoring program for all stages of the Project.

Additionally, on February 23, 2024, Denison sent an email to the YNLR committing to work with the YNLR in the manner you request, which included a commitment to share information about monitoring plans as they develop throughout the permitting and licensing processes.

On March 13, 2024, the YNLR provided Denison with additional comments on Denison's November 23, 2023, EIS responses. Denison responded to these comments on April 5, 2024. A summary of this exchange is as follows.

Denison noted that no further comments were provided for reference nos. 375-378, 382, 385, 392, 395, and 398-438, and Denison indicated that it therefore assumed that Denison's responses, provided on November 23, 2023, could be considered as complete and satisfactory unless otherwise advised.

The YNLR commented about freeze wall efficacy and expressed dissatisfaction in the manner it was analyzed. The YNLR requested an independent assessment. Denison responded by offering to coordinate a meeting between the YNLR and the qualified professional Denison utilized to design the freeze wall.

The YNLR commented that Traditional Knowledge will have no input into groundwater contamination planning until health risks are noted decades or centuries later. Denison clarified that current groundwater modelling did not indicate there would be groundwater contamination or health risks from the Project, and further affirmed its commitment to consider local and Traditional Knowledge in all facets of the Project to the extent local knowledge holders wish to share such information. Additionally, Denison committed to involving the YNLR in the groundwater monitoring plans.

The YNLR continued to express concern with respect to the Project's potential impact on the local Woodland Caribou population and you reiterated the YNLR's desire to be involved in the collaboration and design of monitoring programs. Denison responded by again reaffirming its commitment to work with the YNLR in the manner the YNLR requests. Denison included this commitment in its Commitment Table submitted to the CNSC.

On April 12, 2024, Denison met with the YNLR's board of directors.

On April 30, 2024, Denison emailed the YNLR to follow up on its April 5, 2024, responses and to note that many of the comments were discussed at the April 12, 2024, meeting between Denison and the YNLR's board of directors.

On June 19, 2024, Denison received a letter from the YNLR that explained the YNLR's concerns, as expressed in your February 2, 2024, and March 13, 2024, letters, remain unchanged.

Denison was surprised by this response as it had endeavoured to address the issues raised by the YNLR and make changes to the EIS and the Project to accommodate those concerns.

Letter from YNLR dated June 19, 2024

The YNLR's June 19, 2024, letter responds to Denison's April 5, 2024, EIS responses and its April 30, 2024, email. The responses below are categorized in the same manner as the YNLR's June 19, 2024, letter.

1) There have been no further comments from the YNLR on EIS reference nos. 375-378, 382, 385, 392, 395, and 398-438. As such, Denison assumes that its responses provided on November 23, 2023, are satisfactory and are therefore deemed complete. You responded indicating that the YNLR's comments in letters dated February 2, 2024, and March 13, 2024, remain unchanged and unaddressed.

Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address your concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses of November 23, 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

2) Collaboration on Monitoring Plans and Programs (EIS reference nos. 379, 380, 381, 383, 384, 386, 387, 388, 389, 390, 393, 394, 396, 397). You expressed the YNLR's desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development."

Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward.

It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.

3) Confidence in freeze-wall technology (EIS reference no. 381). The YNLR responded to Denison's offer to meet with its qualified professional utilized to design the freeze wall with your statement that this professional is not sufficiently independent to meet your standards and, going forward, the YNLR would engage with the CNSC for access to an independent technical expert on freeze-wall technology.

Denison respects the YNLR's desire to seek other expertise. In any event, should the YNLR wish to meet with the qualified professional utilized to design the freeze wall, Denison would be happy to facilitate.

4) Caribou Offsets, Preliminary Decommissioning Plan (EIS reference nos. 380, 387, 388, 389). You explained the YNLR's request for specific information as to where caribou offsets are located, and the source of information and methodology used to determine these offsets. You explained that the YNLR cannot provide feedback on decommissioning plans without the former requested information in relation to offset plans.

Denison is committed to the development of a caribou mitigation and offsetting plan for the Project. This plan will be developed ahead of construction and independent of the development of the Project's detailed decommissioning plan.

Denison provided the YNLR with a draft Caribou Management Framework which outlines mitigation and restorative measures within the Provincial Government framework. Denison continues to remain open to feedback from the YNLR on the draft Caribou Management Framework. Further, Denison's previous offer to involve the YNLR in discussions with respect to the development of the decommissioning plans still stands. Decommissioning plans at this stage are conceptual as outlined in the EIS and will continue to be refined through each phase of the Project as it progresses.

5) Traditional Knowledge and Groundwater Monitoring (EIS reference no. 381). You stated that your concerns as to the YNLR's involvement in respect of the groundwater monitoring program and the application of Traditional Knowledge remain unaddressed.

Denison has offered to involve the YNLR in groundwater monitoring plans and notes that the timeline and detail for the development of these plans extends beyond the environmental

assessment process. Denison remains open to the YNLR's involvement in groundwater monitoring plans now and in the future. Further, Denison reiterates that it will continue to consider local and Traditional Knowledge in all facets of the Project to the extent holders of such knowledge wish to share information with us.

Denison has endeavored to address your responses in a comprehensive manner and, as always, remains prepared to discuss matters further. YNLR views have and will continue to be taken into consideration during the Project's environmental assessment and Denison thanks you for your input in this important process.

We look forward to working with you further.

Yours truly,



Janna Switzer
Vice President, Environment Sustainability and Regulatory

cc: Garrett Schmidt, Executive Director, Ya'thi Néné Lands and Resource Office
Jeff Dereniwski, Senior Environmental Assessment Administrator, Applications, Environmental Assessment and Stewardship Branch, Saskatchewan Ministry of Environment
Dr. Ken Scott, Senior Environmental Assessment Administrator, Applications, Environmental Assessment and Stewardship Branch, Saskatchewan Ministry of Environment
Ryan Froess, Senior Advisor/Indigenous and Stakeholder Relations Division, Canadian Nuclear Safety Commission
Jessica Way, Environmental Assessment Officer, Canadian Nuclear Safety Commission
Dana Beaton, Director General, Directorate of Environmental and Radiation Protection and Assessment, Canadian Nuclear Safety Commission - Dana.Beaton@cnsccsn.gc.ca
Nana Kwamena, Director, Environment Review Division, Canadian Nuclear Safety Commission - nana-owusua.kwamena@cnsccsn.gc.ca
Brady Pollock, Executive Director, Environmental Assessment and Stewardship Branch, Saskatchewan Ministry of Environment - brady.pollock@gov.sk.ca

From: [Carolanne Inglis-McQuay](#)
To: [Ty Roberts](#)
Cc: [Ashley Carlson](#)
Subject: RE: [**]Missinipe Land Use Plan
Date: Friday, June 28, 2024 1:45:00 PM
Attachments: [image006.png](#)
[image008.png](#)
[image010.png](#)
[image016.png](#)
[image017.png](#)
[image018.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Hi Ty:

To begin with, I want to start by apologizing to you for not replying to this email sooner. It was only recently noticed that you sent your response to an email address from which the message was sent (which was not my own, which is my error) and as such, the response went back to that original sending email. Sorry about that.

Thanks for your note.

I think it is important to clarify that the only information we have had to date with respect to Lac La Ronge Indian Band's traditional territory has been from the 2012 MILUP, and thus it has been the only information we could therefore use. From my perspective, this was further affirmed when you resent me this document as an outcome of the June 12, 2024 meeting with Denison. It perhaps might be more fair to characterize our position on this matter as neutral, rather than 'firm', because we had access only to the information that was publicly available to us and / or directly provided to us over the years we have been working together.

If LLRIB considers the Wheeler River Project to be within their traditional territory, we accept that. We also accept that we are in the traditional territory of many other Indigenous communities and nations. We would welcome LLRIB sending through any updated traditional territory map, at whatever point in time it becomes available.

Denison has clear criteria we apply when commencing the process of negotiating impact benefit agreements with Indigenous communities or nations, which is related to information from an Indigenous community or nation that provides a clear link between the potential for our Project to adversely impact the collective undertaking of Rights by an Indigenous community. If LLRIB has specific information that would assist Denison in better understanding the potential for LLRIB to meet this criteria, we would be happy to receive it at any time and discuss further.

Irrespective any outcomes related to the above, Denison remains committed to continuing its efforts to be positively responsive to the areas of identified interest by LLRIB in relation to business development and / or community investment and we are always happy to discuss further ways to enhance these efforts.

Sincerely,

Carolanne

Carolanne Inglis-McQuay

Director, Corporate Social Responsibility

t: 306-652-8200 x 128 | f: 306-652-8202

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From: [Ty Roberts](#)
To: [Carolanne Inglis-McQuay](#)
Cc: [Ashley Carlson](#)
Subject: RE: [**]Missinipe Land Use Plan
Date: Friday, June 28, 2024 1:49:15 PM
Attachments: [image005.png](#)
[image007.png](#)
[image009.png](#)
[image016.png](#)
[image017.png](#)
[image018.png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image019.png](#)
[image020.png](#)

Hi Carolanne,

No worries about the email, and thank you for this update. I will send this message to our committee and look forward to working with you and your colleagues at Denison.

Have a great long weekend!

Regards,

Ty Roberts, B.S.A, PAg.
Reserve Lands Manager

Lac La Ronge Indian Band

Lands & Resources

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