



Request for Confidentiality of Material Submitted in Relation to

Denison Application to Prepare Site and Construct - Wheeler River Project

CMD: 25-H9

NOTE 1:

Generally, material received as part of a matter before the Commission is made available to the public by default. The purpose of the confidentiality request process is to seek a decision from the Commission as to whether specific documents or information ("material") being submitted for a Commission proceeding can be protected.

In the interest of enabling a timely decision, any request for confidentiality must be accompanied by:

- an unredacted printable document format (.PDF) version of each document to be deemed confidential, clearly indicating the portion(s) of each document for which confidentiality is being requested; and
- separate **redacted** .PDFs of all documents named in the request, and/or adequately informative **summaries** that can be made publicly available.

The requestor **MUST PROVIDE** a detailed explanation as to how and why sub-rule 12(1) applies to each item (see Table 1, below).

This form must be submitted to the [Commission Registrar](#) if related to a Commission proceeding, or to the applicable Designated Officer if related to a DO proceeding.

With regard to: **Denison Application to Prepare Site and Construct - Wheeler River Project**

I, Amanda Willett, as Vice President Legal & Corporate Secretary, am an authorized representative of Denison Mines Corporation. I understand that:

- material provided to the Canadian Nuclear Safety Commission ("the Commission") as part of a public proceeding will be made publicly available unless the Commission has rendered a decision to take measures to protect it; and
- regardless of any request for confidentiality or approval of same, the material may be disclosed if the Commission is required by law to disclose it (for example, after a request under the [Access to Information Act](#)).

I hereby request that the Commission take measures to protect the following information, pursuant to rule 12 of the [Canadian Nuclear Safety Commission Rules of Procedure](#) (the Rules):

Material for which a request for confidentiality is submitted:

The material that is subject to this request for confidentiality is clearly identified in Table 1, below.

NOTE 2: Where the request for confidentiality applies only to part of the submission, the portions must be clearly identified “CONFIDENTIAL” to distinguish them from any content that is non-confidential.

NOTE 3: The Commission is not responsible for any copyright infringement due to its publication on the public CNSC website of documents that have been submitted by a third party.

Table 1: Material subject to the request for Confidentiality

	Item Name	Portion(s) covered by the Request for Confidentiality	Applicable Criteria Check all that apply	Rationale Explain how the criteria applies and how the summary or redacted version is sufficient to satisfy public interest
1.	Groundwater Protection and Monitoring Plan	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input checked="" type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>The Groundwater Protection and Monitoring Plan sets out Denison’s framework for safeguarding the quality and quantity of groundwater resources throughout all phases of the Project, including preparation, construction, operation, monitoring, and decommissioning. It identifies potential risks to groundwater systems, informs ISR wellfield operations, and prescribes monitoring protocols and mitigation measures to address those risks.</p> <p>The Plan contains sensitive information regarding the location of the Project infrastructure, as well as Denison’s proprietary remediation and monitoring methodologies and wellfield design and operations. Public disclosure of these details could compromise the security of the infrastructure, undermine the effectiveness of protection measures, and reveal commercially valuable strategies to competitors. In addition, the Plan is a dynamic document, subject to ongoing review and refinement as the Project evolves. Premature release could result in</p>

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				outdated or incomplete information being misinterpreted, potentially hindering regulatory processes, and jeopardizing the progression of the Project.
2.	Facility Description Manual	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document.	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input checked="" type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>The Facility Manual provides a comprehensive breakdown of the facilities located at the Project site that are associated with the mining and processing of uranium. It includes technical specifications, operational functions, and interrelationships between site facilities to support safe, efficient, and compliant operations.</p> <p>The Manual contains detailed information on each facility, including reference drawings and diagrams that constitute Denison's proprietary intellectual property. Public disclosure of these materials would enable competitors to replicate specialized designs, processes, or configurations developed through significant investment, thereby conferring an unfair commercial advantage. In addition, the Manual is a living document, subject to ongoing review and updates as the Project progresses. Premature release could result in outdated or incomplete information being misinterpreted, create operational security risks, and disrupt the orderly advancement of the Project. Confidentiality is therefore critical to protecting both the Project's commercial value and its safe execution.</p>

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3.	Wellfield Containment Design Criteria, January 2023	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document.	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input checked="" type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>The Wellfield Containment Design Criteria establishes the engineering requirements and specifications governing the development of the wellfield and associated containment systems for the extraction of uranium deposits. It sets out the standards, methodologies, and best practices that must be adhered to in the design and implementation of the wellfield.</p> <p>The Criteria contains sensitive technical information that, if disclosed publicly, could create security, safety, and operational risks. It includes the capacities, configurations, and operational tolerances of critical infrastructure, which could be exploited to cause intentional damage, unauthorized access, or disruption of water supply. Public release may also expose proprietary engineering methodologies and site-specific data developed at significant cost, giving competitors an unfair commercial advantage. For these reasons, disclosure could compromise both the security of the wellfield and Denison's business interests.</p>

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4.	Well Design Criteria, March 2025	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document.	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input checked="" type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>The Well Design Criteria establishes the engineering requirements and specifications governing the development of the well for the extraction of uranium deposits. It sets out the standards, methodologies, and best practices that must be adhered to in the design and implementation of the wells, and the related ancillary equipment.</p> <p>The Criteria contains sensitive technical information that, if disclosed publicly, could create security, safety, and operational risks. It includes the capacities, configurations, and operational tolerances of critical infrastructure, which could be exploited to cause intentional damage, unauthorized access, or disruption of water supply. Public release may also expose proprietary engineering methodologies and site-specific data developed at significant cost, giving competitors an unfair commercial advantage. For these reasons, disclosure could compromise both the security of the wells and Denison's business interests.</p>

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	Item Name	Portion(s) covered by the Request for Confidentiality	Applicable Criteria Check all that apply	Rationale Explain how the criteria applies and how the summary or redacted version is sufficient to satisfy public interest
5.	Civil Earthworks Design Criteria, March 2025	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document.	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>The Civil Earthworks Design Criteria establishes the engineering standards, specifications, and methodologies governing the design and execution of earthworks for the Project. It defines the technical requirements for grading, drainage, fencing, and other site preparation activities, ensuring compliance with applicable regulatory frameworks and industry best practices.</p> <p>The Criteria contains detailed geotechnical data, site-specific design parameters, and proprietary construction methodologies that are integral to the Project's development. Public disclosure of this information could compromise site security, enable competitors to replicate specialized designs and techniques developed through significant investment, or expose potential vulnerabilities in the Project's infrastructure. Maintaining confidentiality is essential to safeguarding the Project's commercial value, operational security, and the integrity of its construction activities.</p>

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6.	Security Management Program, November 2023	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document.	<input checked="" type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>The Security Management Program sets out Denison's integrated approach to identifying, assessing, and mitigating security risks associated with the Project. It establishes the policies, procedures to be implemented for employees, contractors, and visitors, ensuring the protection of personnel, assets, infrastructure, and information. The Program also defines the responsibilities and protocols necessary to respond effectively to potential threats or incidents.</p> <p>The Program contains highly sensitive information regarding specific security measures, access controls, monitoring systems, and incident response procedures. Public disclosure of these details could compromise the effectiveness of the security measures, increase the risk of unauthorized access or malicious activity, and endanger the safety of individuals and the integrity of the Project site. Maintaining strict confidentiality is critical to preventing the exploitation of security protocols, safeguarding critical infrastructure, and ensuring that security measures remain effective in mitigating potential threats throughout the life of the Project.</p>

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	Item Name	Portion(s) covered by the Request for Confidentiality	Applicable Criteria Check all that apply	Rationale Explain how the criteria applies and how the summary or redacted version is sufficient to satisfy public interest
7.	Wheeler River Preliminary Decommissioning Cost Estimate and Financial Guarantee Memo, June 2025	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document.	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input checked="" type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>The Memorandum provides an overview of the preliminary decommissioning plan, as well as the cost estimate and financial guarantee mechanism for the Project, based on the proposed assets and activities.</p> <p>The Memorandum contains sensitive information, including asset-specific details, cost assumptions, and financial security arrangements, the disclosure of which could provide competitors with strategic insights or undermine Denison's negotiating position. It also includes correspondence with the Saskatchewan Minister of Environment, which is not intended for public release. Public disclosure could compromise commercial confidentiality and create unnecessary risks to the Project's financial and operational planning.</p>

Attestation:

1. I attest that the above-noted material is not available through any public sources.
2. I have attached a **summary** or **redacted** version of the material that provides adequate detail.
3. I understand that if this request is not approved by the Commission, I will have the option of withdrawing the material.
4. I further understand that if the material is not withdrawn it will be part of the public record as per rule 15 of the Rules.
5. I understand that upon receipt of this request, the Commission Registrar will treat the material that is subject to this request as confidential unless and until the Commission makes a ruling.

Attachments:

- Groundwater Protection and Monitoring Plan;
- Facility Description Manual;
- Wellfield Containment Design Criteria, January 2023;
- Well Design Criteria, March 2025;
- Civil Earthworks Design Criteria, March 2025;
- Security Management Program, November 2023; and
- Wheeler River Preliminary Decommissioning Cost Estimate and Financial Guarantee Memo, June 2025.

Authorized signature:



Amanda Willett
Vice President Legal & Corporate Secretary

August 8, 2025

Date

**Request for Confidentiality of Material Submitted in Relation to Denison
Application to Prepare Site and Construct – Wheeler River Project
Summary of Materials**

1. Groundwater Protection and Monitoring Plan

The Groundwater Protection and Monitoring Plan sets out Denison's framework for safeguarding the quality and quantity of groundwater resources throughout all phases of the Project, including preparation, construction, operation, monitoring, and decommissioning. The plan outlines operational monitoring requirements specific to the Wheeler River ISR mine to inform both operational controls and environmental compliance. It identifies potential risks to groundwater resources and outlines the strategies, monitoring programs, and mitigation measures designed to prevent or reduce environmental impacts. The Plan also explains how groundwater data will be collected and analyzed to support operational functions and ensure regulatory compliance and environmental stewardship.

2. Facility Description Manual

The Facility Manual provides a comprehensive breakdown of the facilities located at the Project site that are associated with the mining and processing of uranium. It explains the role of major facility types, including mining infrastructure, processing areas, utility systems, waste management facilities, emission controls, and supporting infrastructure. The purpose and functions of each major facility as well as how these facilities operate together to ensure safe, efficient, and environmentally responsible production, are described.

This Manual serves as an internal reference for ensuring that facilities are designed, operated, and maintained in compliance with applicable regulations and safety standards, and contains technical drawings, operational parameters, and detailed specifications relating to the Project.

3. Wellfield Containment Design Criteria, January 2023

The Wellfield Containment Design Criteria establishes the engineering requirements and specifications governing the development of the ISR wellfield and associated containment systems for the extraction of uranium deposits. It sets out the standards, methodologies, and best practices that must be adhered to in the design and implementation of the wellfield.

4. Well Design Criteria, March 2025

The Well Design Criteria establishes the engineering requirements and specifications governing the development of the ISR well for the extraction of uranium deposits. It sets out the standards, methodologies, and best practices that must be adhered to in the design and implementation of the wells, and the related ancillary equipment.

5. Civil Earthworks Design Criteria, March 2025

The Civil Earthworks Design Criteria establishes the engineering standards, specifications, and methodologies governing the design and execution of earthworks for the Project. It defines the

technical requirements for grading, drainage, fencing, and other site preparation activities, ensuring compliance with applicable regulatory frameworks and industry best practices.

6. Security Management Program, November 2023

The Security Management Program sets out Denison's integrated approach to identifying, assessing, and mitigating security risks associated with the Project. It establishes the policies, procedures to be implemented for employees, contractors, and visitors, ensuring the protection of personnel, assets, infrastructure, and information. The Program also defines the responsibilities and protocols necessary to respond effectively to potential threats or incidents.

7. Wheeler River Preliminary Decommissioning Cost Estimate and Financial Guarantee Memo, June 2025

The Memorandum provides an overview of the preliminary plan for decommissioning the Project at the end of its operational life. It explains the general approach to decommissioning activities, the basis for estimating costs, and outlines Denison's financial mechanism for the financial guarantee to ensure funds are available for closure and reclamation. Specific asset details, cost breakdowns, financial arrangements, and regulatory correspondence, based on the proposed assets and activities of the Project, are contained in the Memorandum.