



Request for Confidentiality of Material Submitted in Relation to

NexGen Energy Ltd. Application for a Licence to Prepare Site and Construct – Rook I Project

CMD: 25-H12 / 25-H12.1

IMPORTANT NOTE:

The purpose of the confidentiality request process is to seek a decision from the Commission as to whether specific information being submitted for a Commission proceeding can be protected. Generally, material received as part of a matter before the Commission is made available to the public by default. The rule of confidentiality (i.e., rule 12 of the [CNSC Rules of Procedure](#)) is applied only if a request for confidentiality is submitted.

The Commission weighs any request for confidentiality against the criteria set out in rule 12 to confirm that:

- the importance of protecting the information outweighs the public interest in public hearings and disclosure of evidence; and
- the measures taken to protect confidentiality are designed to ensure that the public nature of the proceeding will be affected only to the extent necessary to adequately protect the information.

In the interest of enabling a timely decision, any request for confidentiality must be accompanied by redacted versions of all documents named in the request, and/or adequately informative summaries that can be made available to participants and the public. **Please provide the appropriate versions, as applicable.**

It is the responsibility of the requestor to provide an adequately detailed explanation as to how and why sub-rule 12(1) applies.

In the matter of:

Canadian Nuclear Safety Commission public hearing on NexGen Energy Ltd. application for a licence to prepare site and construct for Rook I uranium mine and mill project.

With regard to: CMD 25-H12 / 25-H12.1

I, Luke Moger, as Vice President Environment, Permitting & Licensing, am an authorized representative of NexGen Energy Ltd. I understand that:

- documents and information (“the 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 to be Deemed Confidential:

The material to be deemed confidential is identified in Table 1, below.

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

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 to be Deemed Confidential

	Item Name	Portion(s) to be Deemed Confidential	Reason for Request (details to be provided below)
1.	Rook I Mining and Milling Facility Description Manual (ROOK-ENG-MAN-00001) ¹ ¹ Includes all referenced documents (e.g., design criteria, assessments, studies) contained within supporting appendices and annexes.	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input checked="" type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input checked="" type="checkbox"/> scientific nature, <input checked="" type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.
2.	Nuclear Substance and Radiation Device Management (ROOK-RAD-PRO-00008)	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input checked="" type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input checked="" type="checkbox"/> scientific nature, <input checked="" type="checkbox"/> technical nature, <input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.
3.	Rook I Preliminary Decommissioning and Reclamation Cost Estimate (ROOK-DEC-PLN-00002)	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a: <input checked="" type="checkbox"/> financial nature, <input checked="" type="checkbox"/> commercial nature, <input type="checkbox"/> scientific nature, <input type="checkbox"/> technical nature,

Request for Confidentiality

Table 1: Material to be Deemed Confidential			
	Item Name	Portion(s) to be Deemed Confidential	Reason for Request (details to be provided below)
			<input type="checkbox"/> personal nature, or <input type="checkbox"/> other nature (specify), and is consistently treated as confidential and the person affected has not consented to disclosure.

Proposed measure(s) to be taken and Detailed reason(s) for request:

The above-noted material should be protected for the following reasons:

Table 2: Detailed Reason(s) for Request

Item Name	Measure being Requested	Reason(s) for Request
Rook I Mining and Milling Facility Description Manual (ROOK-ENG-MAN-00001)	<input type="checkbox"/> Proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input type="checkbox"/> Part of the proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input checked="" type="checkbox"/> Publication of information be restricted or prohibited <input type="checkbox"/> Disclosure of information be prohibited or restricted to some or all of the parties and intervenors, or their counsel and agent <input type="checkbox"/> Other measure to protect the information	<p>The <i>Rook I Mining and Milling Facility Description Manual</i> and the documents included within its appendices and annexes are considered confidential due to the commercial, scientific, and technical details (e.g., design criteria, drawings, hazard analyses, technical studies and reports) included and incorporated into the body of the document, which constitutes NexGen's proprietary intellectual property. Public disclosure of these materials would allow competitors to reproduce designs and processes developed through significant investment, thereby compromising NexGen's economic advantage.</p> <p>The <i>Rook I Mining and Milling Facility Description Manual</i> is a living document that is subject to ongoing review and updates as the Project proceeds. Early release may result in outdated or incomplete information being misinterpreted and misunderstood. Confidentiality of the <i>Rook I Mining and Milling Facility Description Manual</i> is critical to protecting both safety and the Project's commercial value.</p> <p>A high-level summary of the <i>Rook I Mining and Milling Facility Description Manual</i> and of infrastructure that is understood to be of particular interest to Indigenous Nations, communities, and members of the public is provided in NexGen's Commission Member Document (CMD:25-H12.1).</p>
Nuclear Substance and Radiation Device Management (ROOK-RAD-PRO-00008)	<input type="checkbox"/> Proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input type="checkbox"/> Part of the proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input checked="" type="checkbox"/> Publication of information be restricted or prohibited <input type="checkbox"/> Disclosure of information be prohibited or restricted to some or all of the parties and intervenors, or their counsel and agent <input type="checkbox"/> Other measure to protect the information	<p>The <i>Nuclear Substance and Radiation Device Management</i> procedure is a detailed, proprietary management system document that outlines methods for safely and securely maintaining nuclear substances and radiation devices in compliance with regulatory requirements. Public disclosure could compromise the effectiveness of the procedure and enable competitors to replicate confidential and proprietary information.</p> <p>A high-level summary of the <i>Nuclear Substances and Radiation Devices Management</i> procedure is provided in NexGen's Commission Member Document (CMD:25-H12.1) and in the <i>Rook I Radiation Protection Program</i>, both of which are publicly available as part of NexGen's submissions.</p>

Table 2: Detailed Reason(s) for Request

Item Name	Measure being Requested	Reason(s) for Request
Rook I Preliminary Decommissioning and Reclamation Cost Estimate (ROOK-DEC-PLN-00002)	<input type="checkbox"/> Proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input type="checkbox"/> Part of the proceeding takes part in private, to the exclusion of members of the public, other than the parties and their counsel or agent <input checked="" type="checkbox"/> Publication of information be restricted or prohibited <input type="checkbox"/> Disclosure of information be prohibited or restricted to some or all of the parties and intervenors, or their counsel and agent <input type="checkbox"/> Other measure to protect the information	<p>The <i>Rook I Preliminary Decommissioning and Reclamation Cost Estimate</i> is considered confidential as it relies on and incorporates information from financial models developed for the Project (e.g., those serving as the basis for unit costs), which are not in the public domain and could compromise NexGen's economic advantage.</p> <p>The <i>Rook I Preliminary Decommissioning and Reclamation Cost Estimate</i> contains sensitive information including asset-specific details, detailed cost assumptions, and financial security arrangements, the disclosure of which could provide competitors with strategic insights while undermining NexGen's ability to negotiate competitively. Public disclosure would compromise confidentiality and create risks to the Project's financial and operational plans.</p> <p>A high-level summary of the <i>Rook I Preliminary Decommissioning and Reclamation Cost Estimate</i>, including the total cost estimate value, is provided in the NexGen's Commission Member Document (CMD:25-H12.1).</p>

Attestation

1. I attest that the above-noted material is not available through any public sources.
2. **MANDATORY:** I have included a **summary** or **redacted** version of the material that provides adequate detail to satisfy the public interest in public hearings and disclosure of evidence.
3. I understand that if this request is not approved by the Commission and/or no protection measures are taken, the information will be part of the public record as per rule 15 of the Rules.
4. 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 to deny this request.

Attachments:

- Rook I Mining and Milling Facility Description Manual (ROOK-ENG-MAN-00001);
- Nuclear Substances and Radiation Devices Management (ROOK-RAD-PRO-00008); and
- Rook I Preliminary Decommissioning and Reclamation Cost Estimate (ROOK-DEC-PLN-00002).

Authorized signature:

 Luke Moger, VP Environment, Permitting & Licensing

2025/10/17

 Date

Request for Confidentiality of Material Submitted in Relation to NexGen Energy Ltd. Application for a Licence to Prepare Site and Construct – Rook I Project

Summary of Confidential Materials

1. Rook I Mining and Milling Facility Description Manual

The *Rook I Mining and Milling Facility Description Manual* documents the design basis and describes the facilities, systems, components, and processes that will be used to carry out the proposed licensed activities. The *Rook I Mining and Milling Facility Description Manual* also provides a comprehensive breakdown of the facilities located at the Rook I Project site that are associated with the mining and milling of uranium. The *Rook I Mining and Milling Facility Description Manual* includes details of the facilities including mining infrastructure, processing areas, utility systems, waste management, emission controls, and supporting infrastructure. The *Rook I Mining and Milling Facility Description Manual* also provides an overview of the expected operating performance and mitigation and control measures required to protect worker health and safety and the environment.

The *Rook I Mining and Milling Facility Description Manual* was developed in support of initial provincial authorizations and the CNSC licence application for the site preparation, construction, and commissioning (i.e., Construction Phase) of the Project. The *Rook I Mining and Milling Facility Description Manual* will be periodically reviewed and revised, as required, and will be updated prior to transition to the Operations Phase.

2. Nuclear Substance and Radiation Device Management

The *Nuclear Substance and Radiation Device Management* procedure describes the processes related to licensed nuclear substances and radiation devices that may be used at the Rook I Project. These processes include procuring, maintaining, exposure monitoring, training, labelling, inspecting, and responding to accidents involving these substances and devices.

This procedure applies to the use of nuclear substances and radiation devices licensed by the Canadian Nuclear Safety Commission (CNSC) for use at the Rook I Project and is based on the requirements of the CNSC *Nuclear Substances and Radiation Devices Regulations* and the *Radiation Protection Regulations*.

As a component of the Rook I Integrated Management System, this procedure is a controlled document that will be periodically reviewed and revised (as required) throughout the Project lifespan.

3. Rook I Preliminary Decommissioning and Reclamation Cost Estimate

The *Rook I Preliminary Decommissioning and Reclamation Cost Estimate* provides a conceptual and preliminary estimate of the cost to decommission and reclaim all surface and underground infrastructure planned to the end of the Construction Phase of the Project, which includes site preparation, construction, and commissioning of Project infrastructure. The *Rook I Preliminary Decommissioning and Reclamation Cost Estimate* explains the basis for estimating costs and outlines NexGen's financial mechanism for the financial guarantee to ensure funds are available for decommissioning and reclamation.