



CMD 25-H9.1D

Date: 2025-11-25

Supplementary Information

Renseignements supplémentaires

Written Submission from Denison Mines Corporation

Mémoire de Denison Mines Corporation

In the matter of

À l'égard de

Denison Mines Corporation

Licence Application to Prepare Site and
Construct for Denison Mines' Wheeler
River Mine and Mill Project

Denison Mines Corporation

Demande de permis pour la préparation de
l'emplacement et la construction du projet
de mine et d'usine de concentration
d'uranium Wheeler River de Denison Mines

Commission Public Hearing Part 2

Audience publique de la Commission Partie 2

December 8-11, 2025

8-11 décembre 2025

November 25, 2025

Denison Mines Corp.

Supplementary Submission

*Summary of Wheeler River Project Engagement Completed
Following Submission of Indigenous Engagement Report*

In support of the Wheeler River Project Public Hearing 2025-H-09 on
the Environmental Assessment and Application for the Licence to
Prepare a Site for and Construct a Uranium Mine and Mill

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Introduction

This document outlines the continuing dialogue and collaboration activities undertaken by Denison Mines Corp. (Denison) with Indigenous communities and organizations following the submission of the updated Indigenous Engagement Report (IER) in August 2025. The August 2025 IER represented the fifth update to the report and was specifically prepared as a Commission Member Document provided to the Canadian Nuclear Safety Commission (CNSC) in advance of Part 1 of the Wheeler River Project (Project) commission hearing regarding Denison's request for (i) a positive decision statement for the Project, and (ii) the issuance of a Licence to Prepare Site and Construct.

Indigenous engagement has and continues to be foundational to Denison's development of the Project. Consistent with its Indigenous Peoples Policy (IPP), Denison recognizes the unique and important relationship Indigenous peoples have with the environment and their respective Treaty and/or Aboriginal rights.

The scope of this supplementary document focuses on engagement with Indigenous communities and organizations that occurred during the period immediately subsequent to the August 2025 IER submission and prior to the commencement of Denison's Part 2 Hearing, and other engagement activities which are relevant to assertions made by certain Indigenous Nations in their written submissions to the CNSC. Where appropriate, it also responds to certain written submissions made by Indigenous Nations for part two of the Project's public hearing before the CNSC.

Denison's Approach to Engagement

Denison's approach to engagement is guided by its IPP, which meaningfully reflects and incorporates the standards and principles articulated by the United Nations Declaration on the Rights of Indigenous Peoples. Since 2016, Denison has carried out extensive engagement activities with Indigenous communities in a manner which reflects the demonstrated potential for the Project to adversely impact their Aboriginal rights. Throughout this engagement, seeking the free, prior and informed consent of those Indigenous communities has been and remains Denison's consistent objective.

Denison has, subject to the ratification processes described below, secured the free, prior and informed consent to and support for the Project from eighteen Indigenous Nations, along with the consent to and support for the Project from four northern communities, four Indigenous organizations, and five municipalities (as further described in Appendix C). Denison is delighted that it has achieved such expansive support from Indigenous communities which are proximate to the Project. An overview of the agreements which formalize this consent and support is provided below.

On September 26, 2023, Denison and English River First Nation entered into a Shared Prosperity Agreement, pursuant to which English River First Nation provided their free, prior and informed consent to the Project.

On March 26, 2024, Denison entered into a Sustainable Communities Investment Agreement with the Northern Village of Beauval, the Northern Village of Île-à-la-Crosse, the Northern Hamlet of Jans Bay, and the Northern Hamlet of Cole Bay. The Sustainable Communities Investment Agreement provides those municipalities' consent to and support for the development and operation of the Project.

On July 10, 2024, Denison and Kineepik Métis Local #9 entered into a Mutual Benefits Agreement, pursuant to which KML provided their free, prior and informed consent to the Project.

On July 10, 2024, Denison and the Village of Pinehouse entered into a Community Benefit Agreement. The Village of Pinehouse is the closest residential community to the Project. The Community Benefit Agreement provides the Village of Pinehouse's consent to and support for the Project.

As of the date of writing, Denison has reached an agreement in principle with Ya'thi Néné Lands and Resource Office (YNLR) and Fond du Lac Denesuline First Nation, and with the Métis Nation of Saskatchewan (detailed below) which Denison hopes to be concluded soon.

The Nuhenéné Benefit Agreement with YNLR and Fond du Lac Denesuline First Nation is expected to be formally signed in late November 2025, subject to ratification by YNLR, the Athabasca Communities (as defined below) and Fond du Lac Denesuliné First Nation. YNLR represents multiple Indigenous Nations and northern communities located in the Athabasca Basin, specifically: Hatchet Lake Denesuline First Nation, Black Lake Denesuline First Nation, Camsell Portage, Stony Rapids, Uranium City and Wollaston Post. Fond du Lac Denesuline First Nation is also entering into the agreement on their own behalf. The Nuhenéné Benefit Agreement provides the free, prior and informed consent of those Indigenous Nations and northern communities to the Project.

The Impact Benefit Agreement with Métis Nation of Saskatchewan is expected to be formally signed in late November or early December 2025, subject to ratification by the Métis Nation (as defined

below). Metis Nation – Saskatchewan (MN-S) is the elected government of Métis peoples in Saskatchewan, other than KML. The Impact Benefit Agreement provides the free, prior and informed consent for the Project of MN-S, thirteen Métis Locals, and Northern Region 1 and Northern Region 3.

Together, these agreements represent Denison's significant efforts and successes in achieving the free, prior, and informed consent of Indigenous communities in Saskatchewan which are the closest Indigenous communities to the Project and most likely to experience adverse impacts to their Treaty and Aboriginal rights from the Project.

English River First Nation

Denison has continued its engagement and collaboration with English River First Nation (ERFN), building upon a long-term, trusting and mutually beneficial relationship formalized by prior agreements, including the letter of consent and support for the Project provided by ERFN in September 2023. Since the submission of the updated Indigenous Engagement Report in August 2025, Denison's collaboration with ERFN has focused on proactively sharing regulatory documents and plans which have been identified as areas of interest by ERFN.

On September 9, 2025, Denison provided ERFN with the draft Application to Construct a Pollutant Control Facility for the Project. This was shared in advance of formal filing with the Province of Saskatchewan, along with a timeline for comments, recommendations, and the resolution of any outstanding items.

On September 24, 2025, after reviewing the draft Application to Construct a Pollutant Control Facility, English River First Nation indicated to Denison that they had no comments or concerns regarding the draft.

Additionally, Denison has shared the Project's draft Caribou Mitigation and Offset Plan with ERFN for their review and comment. Denison will continue working with the ERFN to coordinate engagement activities related to their topics of interest related to the Project in accordance with mutually agreeable processes.

Kineepik Métis Local #9

Denison has continued its engagement with Kineepik Métis Local #9 (KML) following the submission of the updated Indigenous Engagement Report in August 2025. This collaboration builds upon the extensive engagement between Denison and KML to date, which includes the July 2024 Agreement pursuant to which KML provided their consent to and support for the development and operation of the Project. KML had previously confirmed in December 2023 that Denison's responses addressed or resolved their comments and concerns on the draft Environmental Impact Statement (EIS) and the Project.

The engagement activities with KML since August have focused on proactively collaborating on the review and preparation of regulatory documents related to the licensing process. On September 9, 2025, Denison provided KML with the draft Application to Construct a Pollutant Control Facility for the Project. This document was shared in advance of formal filing with the Province of Saskatchewan, and Denison provided a timeline for KML to offer comments, recommendations, or seek resolution of any outstanding items prior to that formal filing. In response, on September 22, 2025, Kineepik Métis Local #9 indicated that they had no comments or concerns regarding the draft Application to Construct a Pollutant Control Facility.

Additionally, Denison has shared the Project's Caribou Mitigation Plan for review and comment. Denison will continue to engage with KML to advance a long-term, mutually beneficial relationship alongside the development of the Project.

Métis Nation - Saskatchewan

Since 2019, Denison has engaged with the MN-S, Northern Region 1, Northern Region 3, and thirteen Métis Locals which have delegated their duty to consult for the Project to the MN-S. Other than KML, these Métis governing bodies represent all of the Métis people with the potential to be adversely affected by the Project.

Over the past year, Denison, MN-S, and other Métis representatives have engaged extensively to finalize the terms of an Impact Benefit Agreement with the MN-S; Uranium City, Local 50; Stony Rapids, Local 80; La Ronge, Local 19; Weyakwin, Local 16; Timber Bay, Local 20; Patuanak, Local 82; Île-à-la-Crosse, Local 21; Canoe River, Local 174; Jan's Bay, Local 38; Beauval, Local 37; Cole Bay, Local 41; Dore/Sled Lake, Local 67; Green Lake, Local 5; Northern Region 1; and, Northern Region 3 (collectively, the Métis Nation). The Impact Benefit Agreement includes procedural and substantive commitments to address the Métis Nation's concerns regarding the Project, and provides the Métis Nation's free, prior, and informed consent to the Project.

In addition to those activities, the MN-S recently shared information regarding additional traditional land use (TLU) related to the Project on September 18, 2025. This TLU data was gathered in early 2025 and concerns a Métis extended family's use of the lands surrounding the Project. Denison understands that, pursuant to an agreed-upon engagement process and the accommodation measures contained in the Impact Benefit Agreement, all of the Métis Nation's concerns regarding the Project have been satisfactorily addressed, including in the context of the Métis Nation's Aboriginal rights and interests under section 35 of the *Constitution Act, 1982*.

Denison looks forward to continuing to build a long-term, mutually beneficial relationship with the Métis Nation in accordance with the agreed-upon engagement process.

Ya'thi Néné Lands and Resource Office

Denison has been engaging with Ya'thi Néné Lands and Resource Office (YNLR) and Fond du Lac Denesuline First Nation since 2019. YNLR represents Hatchet Lake Denesuline First Nation and Black Lake Denesuline First Nation, and the northern communities of Camsell Portage, Stony Rapids, Uranium City and Wollaston Post (collectively, the Athabasca Communities). Fond du Lac Denesuline First Nation had delegated their duty to consult to YNLR for the majority of the Project's environmental assessment, and has recently chosen to represent their own Treaty and Aboriginal rights for the purposes of consultation and engagement with Denison. The Nuhenéné Benefit Agreement with YNLR, the Athabasca Communities and Fond du Lac Denesuline First Nation is expected to be formally signed in late November 2025, following ratification. The Nuhenéné Benefit Agreement provides the free, prior and informed consent of those Indigenous Nations and northern communities to the development and operation of the Project.

Denison is proud of the trusting, respectful relationship it has developed with YNLR, the Athabasca Communities and Fond du Lac Denesuline First Nation. Denison looks forward to continuing advancing this relationship alongside the development of the Project.

Birch Narrows Dene Nation

Denison has continued to engage with Birch Narrows Dene Nation (BNDN) in a manner respectful of BNDN's interests and commensurate with the Project's potential impacts to their Treaty and Aboriginal rights. This continued engagement reflects Denison's commitment to ensuring BNDN stays informed regarding the progress of the Project, and that Denison remains responsive to BNDN's interests and concerns.

In September 2025, BNDN requested that Denison provide additional information related to the geographic scope of the Project. BNDN requested geographic data files on September 15, 2025, related to the Project area, Local Study Area, and Regional Study Area, as depicted in the Indigenous Land and Resource Use section of the Project's EIS. Denison provided these geographic data files to BNDN on September 22, 2025.

In October 2025, BNDN informed Denison that they are actively working with the CNSC on a process for sharing Indigenous Knowledge related to the Project to support the CNSC's understanding of potential impacts to BNDN's Treaty and Aboriginal rights (**ROC 1271**). BNDN indicated that while the CNSC suggested a certain level of information sharing with Denison might be required, BNDN's position is that sharing Indigenous Knowledge should not be a prerequisite to engagement. Denison has not made the sharing of Indigenous Knowledge a prerequisite to engagement with BNDN or any other Indigenous community. Denison has engaged and continues to engage with all Indigenous communities that have the potential to be adversely impacted by the Project or which express interest in engagement. The extent of Denison's engagement, and its ability to respond to issues and concerns raised by Indigenous communities, may be influenced by the sharing of Indigenous Knowledge from those communities with Denison. As such, Denison has encouraged Indigenous communities, including BNDN, to share their knowledge with Denison where this may facilitate a better understanding of the community, the Project, and the interactions between them.

To date, BNDN has not specific shared Indigenous Knowledge or land use information related to the Project with Denison. In February 2023, during an in-person meeting between BNDN and Denison, BNDN informed Denison that they were in possession of information which demonstrated BNDN's land use near the Project. To facilitate the sharing of this information, and at the request of BNDN, Denison sent BNDN a non-disclosure agreement in April 2023. However, BNDN declined to sign the confidentiality agreement at that time and maintained that funding was necessary to formally share their existing Indigenous Knowledge and land use information, without substantiating the need for funding.

Denison has continued to encourage BNDN to share their Indigenous Knowledge and land use information. In October 2025, Denison again sent BNDN a confidentiality agreement to support BNDN's process for sharing information with the CNSC and Denison, revised to reflect concerns expressed about earlier versions (**ROC 1271**). On November 19, 2025, Denison requested an update from BNDN with respect to the confidentiality agreement (**ROC 1275**). Denison and BNDN then arranged a virtual meeting in which discussion would focus on BNDN's concerns and BNDN's perspective on associated accommodation measures.

On November 25, 2025, Denison and BNDN met to discuss BNDN's interests related to the Project. During this meeting, Denison was advised that BNDN had returned a signed copy of the Non-Disclosure Agreement, but it was not received by Denison staff. The NDA was re-sent to Denison staff, received, signed by Denison and sent back to BNDN.

During this meeting, Denison informed BNDN that it would request the Province of Saskatchewan include BNDN as a participant in the Eastern Athabasca Regional Monitoring Program. Denison also explained that it will support BNDN's economic interests in the Project by providing opportunities for BNDN members to apply for employment positions and training initiatives at the Project, and continuing to consider BNDN businesses for contracting opportunities. Denison also committed to supporting BNDN in respect of the Project's mitigation strategies, including by collaborating on independent environmental monitoring programs related to the areas of interest identified by BNDN. BNDN appreciated Denison's proposal to formally request the Province include BNDN in EARMP, along with Denison's offer to collaborate on independent environmental monitoring. Denison appreciated this opportunity to meet with BNDN, and is hopeful the parties will continue to advance further positive discussions in the near future.

Denison has responded to BNDN's comments and concerns in respect of the Project throughout the environmental assessment. On February 28, 2023, BNDN submitted 89 technical comments on the Project's draft EIS. On July 31, 2023, the Chief Executive Officer of Denison met with BNDN to understand their concerns and identify opportunities to incorporate BNDN's feedback into the draft EIS. Following this meeting, Denison responded to all of the comments submitted by BNDN and revised sections of the draft EIS in response to BNDN's comments. Denison also provided a written summary for BNDN members that outlined the actions Denison was taking to protect traditional lands and the environment.

On January 16, 2024, BNDN provided a letter to Denison which stated BNDN was satisfied with Denison's responses to their comments on the draft EIS. The letter also confirmed the written summary prepared by Denison for BNDN members provided answers to their general areas of concern, which BNDN also deemed satisfactory.

After that date, Denison continued to share Project information with BNDN. However, BNDN provided no further comments on the draft EIS or the Project generally.

On March 3, 2025, BNDN delivered a letter to Denison which explained BNDN was rescinding their previous letter, dated January 16, 2024, stating that letter no longer accurately reflected BNDN's position in respect of the Project. On March 12, 2025, Denison responded to BNDN's March letter and offered to meet to discuss BNDN's concerns and identify ways they may be addressed moving forward (**ROC 1196**). BNDN did not respond to this invitation to meet.

It is not clear to Denison why BNDN's position changed from January 2024 to March 2025, given that the Project did not change during that time period and BNDN's January 2024 letter stated that BNDN was satisfied with Denison's prior responses. Nonetheless, Denison again offered to engage with BNDN to better understand their perspective on the Project.

Then, in a letter sent on May 26, 2025 to Denison and the CNSC, BNDN requested any previous correspondence on the public registry which could be interpreted as BNDN's support for the Project be removed and disregarded in the CNSC's environmental assessment and licensing-decision making processes for the Project. In particular, BNDN requested that previous letters from Birch Narrows Dene Development Inc. (BNDDI) be removed from the public registry. In this May 26 letter, BNDN also provided 104 comments on the EIS, 64 of which BNDN categorized as "Not Addressed" (**ROC 1222**).

Denison provided an initial response to the May 26 letter on July 3, 2025, in which Denison advised BNDN that Denison's technical team was actively reviewing their technical comments and would

provide responses in the near future (**ROC 1225**). The July 3 letter further explained that Denison was not aware of any letters submitted by BNDDI as part of the Project's environmental assessment, and confirmed that all correspondence which Denison previously received had been sent from BNDN's Chief or council. Denison again offered to meet with BNDN to discuss their concerns, but did not receive a response to this invitation.

BNDN sent an additional letter to Denison, the CNSC and the Province of Saskatchewan on August 29, 2025, asserting that the positions advanced by Denison represent a breach of the Crown's obligation to consult with BNDN. Denison understands that BNDN's principal concern is that Denison has not entered into an impact benefit or similar agreement with BNDN, and that Denison did not list BNDN as an Indigenous Community of Interest (**ROC 1283**).

On September 11, 2025 the CNSC replied to the BNDN letter of August 29, 2025 stating that BNDN had not provided CNSC staff nor Denison with specific information regarding their land use and exercise of rights in the proposed Project area and requested materials be shared with the CNSC and Denison accordingly. The CNSC also offered a trilateral meeting between Denison, the CNSC and BNDN accordingly (**ROC 1285**). BNDN did not respond to this offer to meet.

On October 9, 2025 the Province of Saskatchewan replied the BNDN letter of August 29, 2025 providing BNDN with an update regarding the status of the Project and a response to BNDN's concerns (ROC 1270).

On October 24, 2025, Denison responded to BNDN's recent letters and each of the May 26, 2025 technical comments categorized as "Not Addressed" (**ROC 1273**). Denison had meaningfully reviewed the further comments and provided comprehensive responses to the remaining issues where further or new information was available.

In this response, owing to the nature of many of the 'Not Addressed' comments, Denison also explained that it does not determine which Indigenous Nations the Crown is obliged to consult with. Denison supports the Crown by carrying out engagement activities and fulfilling certain procedural elements of the duty to consult. In doing so, Denison has worked to ensure its engagement is proportionate to the potential for the Project to impact the rights of differently situated communities. For those Indigenous communities in closer proximity to the Project area and with more traditional land use in the area of the Project, as demonstrated through publicly available information or information shared with Denison, consultation with those communities has been more extensive in order to assess the potential impacts to Aboriginal rights and to identify appropriate mitigate measures.

The information publicly available or shared with Denison regarding BNDN land use relative to the Project has been generally limited, although on November 25, 2025 BNDN provided some additional general details to Denison in a meeting in relation to the Project location and the traditional territory of BNDN, as well as discussion about generalized land use activities.

Given the information that Denison has obtained or been provided, and given BNDN's location relative to other Indigenous communities, Denison anticipates that potential impacts to BNDN's Treaty and Aboriginal rights, as asserted by BNDN, will be addressed by existing mitigation measures. During the environmental assessment process, Denison assessed potential impacts to Indigenous rights based on the most frequent resource users in the Project area, and mitigation measures were developed based on potential impacts to those land users. Indigenous Land and Resource Use was identified as a stand-alone Valued Component, with resource abundance,

access to traditional lands and waters, and perceived suitability of land and resources therein used as key indicators. The mitigation measures which will be implemented by Denison are expected to result in insignificant impacts to the most frequent land users in the Project area and to reasonably accommodate Indigenous rights and interests. After taking into account these mitigation measures, the effects of the Project on BNDN's Treaty and Aboriginal rights are expected to be insignificant.

Denison is not and has never been dismissive of BNDN's Treaty and Aboriginal rights. Denison's ongoing requests for BNDN to share their existing Indigenous Knowledge and land use information is based on Denison's desire to understand potential impacts of the Project on BNDN's Treaty and Aboriginal rights. Denison's ability to tailor engagement activities to the particularized interests and concerns of BNDN is based on information which is publicly available or otherwise provided to Denison. In the absence of that information, Denison has addressed those asserted potential impacts to BNDN's Treaty and Aboriginal rights by designing mitigation measures to minimize potential impacts, as described above.

On November 25, 2025, Denison and BNDN met to discuss BNDN's interests related to the Project. During this meeting, Denison was advised that BNDN had returned a signed copy of the Non-Disclosure Agreement, but it was not received by Denison staff. The NDA was re-sent to Denison staff, received, signed by Denison and sent back to BNDN.

During this meeting, Denison informed BNDN that it would request the Province of Saskatchewan include BNDN as a participant in the Eastern Athabasca Regional Monitoring Program. Denison also explained that it will support BNDN's economic interests in the Project by providing opportunities for BNDN members to apply for employment positions and training initiatives at the Project, and continuing to consider BNDN businesses for contracting opportunities. Denison also committed to supporting BNDN in respect of the Project's mitigation strategies, including by collaborating on independent environmental monitoring programs related to the areas of interest identified by BNDN. BNDN appreciated Denison's proposal to formally request the Province include BNDN in EARM, along with Denison's offer to collaborate on independent environmental monitoring. Denison appreciated this opportunity to meet with BNDN, and is hopeful the parties will continue to advance further positive discussions in the near future.

Lac La Ronge Indian Band

Denison has continued engagement with the Lac La Ronge Indian Band (LLRIB) following the submission of the updated Indigenous Engagement Report in August 2025. This continued engagement reflects Denison's stated commitment to ensuring LLRIB stays informed regarding the progress of the Project and that Denison remains responsive to LLRIB's interests.

Since 2019, Denison has shared information about the Project and engaged with LLRIB to understand their interests in the Project. While the CNSC did not identify LLRIB as an Indigenous Nation with the potential to be adversely impacted by the Project, Denison has continually engaged with LLRIB in furtherance of building a respectful, trusting relationship which responds to LLRIB's interests.

On August 30, 2023, Denison met with LLRIB's Traditional Land & Resources Advisory Committee to discuss LLRIB's interest in the Project, and the concerns shared by LLRIB in respect of the draft EIS. In their comments on the draft EIS, LLRIB asserted that some of their members were land users in the Project Area. In response, Denison encouraged LLRIB to share information regarding land users in and around the Project area. Denison explained that the Project is located in the N-18 furblock for registered trappers, which delineates the boundaries of ERFN's trapping boundaries in relation to the Project area, which at that time, appeared to be outside LLRIB's traditional territory as publicly available and as Denison understood. The information that had been provided to Denison up to that point, and throughout the remainder of the environmental assessment, demonstrated the Project would not result in potential impacts to LLRIB's Aboriginal rights.

Denison understands that in their recent intervention submitted to the CNSC, LLRIB shared an updated map of their traditional territory on a confidential basis. Denison understands this map depicts the Project within the outer boundary of LLRIB's traditional territory. Denison appreciates the time and resources LLRIB committed to reviewing the Project location and study areas presented in the EIS. However, Denison's approach to assessing potential impacts on Aboriginal rights is not solely based on an Indigenous Nation's proximity to the Project. Instead, Denison's methodology in the environmental assessment followed a conservative approach in assessing potential impacts on Indigenous rights. Potential impacts were assessed based on the most frequent land users in the Project area, and mitigation measures were developed based on potential impacts to those land users. The mitigation measures for the Project will significantly limit any potential impacts to the most frequent land users, and such mitigation measures are inclusive of potential impacts to less frequent land users. As a result, the potential impacts from the Project on LLRIB's Treaty and Aboriginal rights will be addressed and, where applicable, accommodated by the mitigation measures developed for the Project.

Throughout Denison's engagement with LLRIB, Denison has continuously responded to LLRIB's interests in the Project. In 2023, LLRIB requested that Denison support the LLRIB Heritage Fund and engage with Kitsaki Management, the economic development vehicle for LLRIB, both of which have actively occurred since that time.

Since 2023, Denison has made regular financial contributions to LLRIB's Heritage Fund to support LLRIB members to practice traditional activities.

Denison has also continued to respond to information requests from LLRIB. On August 7, 2025, LLRIB requested geographic data files of the Project boundary. Denison responded by providing

these requested geographic data files on August 11, 2025. These shapefiles had been previously provided by Denison at the request of LLRIB in early 2023.

Further information requests followed on September 16, 2025, when LLRIB requested geographic data files related to the Indigenous Land and Resource Use (ILRU) study areas, as specified in Section 11 of the Project's Environmental Impact Statement. Denison supplied these requested files on September 22, 2025. Denison will continue to ensure LLRIB is informed about the progress of the Project, and support areas of interest identified by LLRIB.

Peter Ballantyne Cree Nation

PBCN was provided with an opportunity to review the draft EIS in November 2022. PBCN first expressed their interest in the Project in 2023, four years after Denison initiated the environmental assessment process. Since being notified of PBCN's interest in the Project, Denison has continuously expressed a commitment to engaging with PBCN to understand and address their interests and concerns. Denison has engaged with PBCN in a manner proportional to the potential for the Project to impact PBCN's rights and interests, based on publicly available information or information shared with Denison, which is consistent with Denison's overall engagement approach. Since 2023, Denison has encouraged PBCN to share available information regarding their traditional and current land use in the Project area.

In 2023, PBCN informed Denison that it would provide information related to specific PBCN land uses in and around the Project. When Denison met with PBCN on September 20, 2023, to discuss the Project and potential impacts to PBCN, the information shared by PBCN did not demonstrate that PBCN's Treaty or Aboriginal rights could be appreciably impacted by the Project. Instead, the information focused primarily on Wollaston Lake and Southend (each of which is hundreds of kilometers downstream from the Project location). Denison has not discounted or ignored this information, and has continued to engage with PBCN in a manner commensurate with the potential for the Project to impact PBCN Aboriginal rights and to be responsive to PBCN's interests and concerns.

After meeting with PBCN on September 20, 2023, Denison continued to engage with PBCN, including by encouraging PBCN to share existing land use information related to the Project area. In January 2024, Denison offered to support PBCN's engagement with Denison on a cost-recovery basis and confirmed Denison's understanding that the CNSC had provided PBCN with funding to review the draft EIS. PBCN did not respond to this or other correspondence sent by Denison until April 8, 2025.

On April 8, 2025, PBCN delivered a letter and a draft Firelight Memo to Denison on a confidential basis that set out PBCN's concerns regarding the Project along with recommended actions to address those concerns, which memo Denison understands has since been shared with the CNSC. On May 13, 2025, Denison responded to PBCN and requested information to support Denison's understanding of the Firelight Memo. In particular, the Firelight Memo did not contain spatial or temporal details regarding land use by PBCN members to demonstrate the basis for PBCN's assertion that the Project would adversely impact PBCN's Aboriginal rights (**ROC 1219**).

On May 13, 2025, legal counsel to Denison affirmed the offer to meet with PBCN to discuss their concerns. Legal counsel for Denison and legal counsel for PBCN then met to discuss potential capacity funding to reflect PBCN's interest in the Project, PBCN's potential interest in meeting with Denison and CNSC staff, and PBCN's interest regarding the Eastern Athabasca Regional Monitoring Program.

On May 27, 2025, legal counsel for PBCN provided Denison's legal counsel with a document titled "PBCN Preliminary Comments on Technical Comments" which set out PBCN's remaining concerns in respect of the Project.

In June 2025, Denison shared a draft capacity funding agreement with PBCN, which was intended to reflect PBCN's interests and concerns related to environmental monitoring. PBCN had no comments or concerns regarding the draft agreement, and legal counsel to PBCN advised that PBCN

planned to meet with CNSC over the coming weeks (**ROC 1286**). In July 2025, Denison confirmed the funding under the agreement and expressed Denison's willingness to meet with PBCN and CNSC staff, requesting that PBCN inform Denison when the meeting was scheduled. PBCN did not respond to this request regarding a meeting with PBCN and CNSC staff.

On August 11, 2025, Denison responded to PBCN's Preliminary Comments on Technical Comments. In this response, Denison committed to collaborating with PBCN in respect of the Project's mitigation strategies, including by collaborating on environmental monitoring programs related to the areas of interest identified by PBCN. These include: (i) groundwater monitoring programs, (ii) monitoring programs for water and sediment quality, benthic invertebrates, and fish and fish habitat, and (iii) the mitigation and offset plan for caribou. Denison also provided comprehensive technical responses to PBCN's concerns regarding water quality and freshwater resources, environmental monitoring and participation, and cultural and environmental impacts (**ROC1246**).

On August 20, 2025, Denison and PBCN entered into an Environmental Monitoring and Engagement Agreement, which provides capacity funding to PBCN to carry out environmental monitoring activities based on their areas of interest and concern, as identified in the April 8, 2025, Letter and the PBCN Preliminary Comments on Technical Comments (**ROC 1253**).

On August 22, 2025, Denison sent a further letter to PBCN expressing their interest in meeting to discuss monitoring programs and mitigation strategies related to the Project. PBCN did not provide a response to this letter, or Denison's request to meet with PBCN.

Consistent with the commitment to provide PBCN with the opportunity to review and provide comments on environmental monitoring programs relevant to the areas of interest identified by PBCN, Denison offered to share the draft Woodland Caribou Mitigation Plan for the Project with PBCN on September 29, 2025. Denison has not received a response from PBCN with respect to this offer.

In their recent intervention submitted to the CNSC, PBCN submitted any licence granted to Denison should include certain conditions, including:

- Denison will establish water quality monitoring stations at the Kinoosao, Southend, and Sandy Bay reserves;
- Denison will co-develop with PBCN a water monitoring program to monitor groundwater quality downstream of Whitefish Lake;
- Denison will co-develop with PBCN a comprehensive tissue sampling program to monitor bioaccumulation of hazardous chemicals in fish, mammals, plants and fungus;
- PBCN will participate in the environmental committee overseeing the Project;
- PBCN will participate in the Best Available Technology Economically Available Study (BATEA);
- PBCN will have an opportunity to review and comment on all caribou mitigation and offsetting plans;
- Denison will amend its EIS to include the concerns with the Project identified by PBCN; and
- CNSC and Denison will develop a strategic engagement framework with PBCN and continue to engage PBCN as a formal "Indigenous Community of Interest" with respect to the Project in accordance with that term as defined in the EIS.

Respectfully, the majority of these measures have already been addressed by the Environmental Monitoring and Engagement Agreement and Denison's existing commitments in the EIS. In particular:

- Denison has committed to collaborating with PBCN in respect of the Project's groundwater monitoring programs, monitoring programs for water and sediment quality, benthic invertebrates, and fish and fish habitat, and the mitigation and offset plan for caribou;
- Denison has committed to a fish health monitoring program which will include measurements of fish health in comparison to baseline data and regulatory criteria, which will investigate the bioaccumulation of non-radiological and radiological parameters;
- Denison has committed to assessing and minimize copper concentrations in effluent through a BATEA assessment during licensing;
- The funding provided by Denison pursuant to the Environmental Monitoring and Engagement Agreement will support PBCN with carrying out a water monitoring program to monitor groundwater quality downstream of Whitefish Lake, and with carrying out monitoring activities at the Kinoosao, Southend, and Sandy Bay reserves;
- Denison shared the draft Woodland Caribou Mitigation Plan for the Project with PBCN on September 29, 2025 for their review and feedback, and PBCN has not provided any comments or response; and
- Denison has previously committed to supporting PBCN's participation in the Eastern Athabasca Regional Monitoring Program.

In light of these commitments, Denison believes that PBCN's interests and concerns in respect of the Project have been adequately accommodated. To the extent PBCN asserts the Project has the potential to adversely impacts their Treaty and Aboriginal rights, the mitigation measures which Denison will implement are based on a conservative assessment of potential impacts to Indigenous rights. Denison's assessment was based on potential impacts to land users who most frequently use the Project area. The mitigation measures Denison developed from this assessment are expected to result in minimal impacts to those most frequent land users and to reasonably accommodate Indigenous interests. Residual impacts from the Project on less frequent land users are expected to be insignificant. There is no evidence to indicate that the potential impacts from the Project on PBCN's Treaty and Aboriginal rights will be different than those assessed by Denison in the EIS. Further, Denison's predictive modelling found that the Project will not result in impacts to the bodies of water which are situated closest to the Project. Since no adverse impacts are expected to occur in these areas closest to the Project, no effects are expected in areas further downstream in the watershed, including downstream of Whitefish Lake and the areas significantly downstream from the Project where PBCN members reside and access resources, such as Kinoosao, Southend and Sandy Bay.

Denison will continue providing engagement opportunities to PBCN related to their areas of interest and collaborating with PBCN, to the extent PBCN is interested in doing so.

Conclusion

Recent engagement activities, detailed in this document, demonstrate Denison's ongoing commitment to conducting engagement activities in accordance with the principles in its IPP. In particular, the Project support provided by the Métis Nation, along with YNLR and Fond du Lac Denesuline First Nation, ensure that the Indigenous communities closest to and more likely to experience the effects of the Project, have consented to its development.

With respect to those First Nations that have expressed interest in the Project and have not provided their consent (PBCN, BNDN and LLRIB), Denison has engaged with these communities to understand their interests and the potential for Project impacts on their Treaty and Aboriginal rights. Denison has addressed their concerns and will continue to do so throughout the life of the Project.

Based on the engagement process and available information, Denison believes that all Indigenous peoples' rights and interests in relation to the Project have been properly addressed, including via accommodation in the EIS and elsewhere as appropriate.

Appendix A: Engagement Summary Tables

English River First Nation

Date/Method	Event Summary
Sep 9, 2025 Application	In advance of formally filing with the Province of Saskatchewan, Denison provided English River First Nation with the Application to Construct a Pollutant Control Facility for the Wheeler River Project and provided a timeline for comments and recommendations and the resolution of any outstanding items prior to formal filing.
Sep 24, 2025 Email	In response to the draft Application to Construct a Pollutant Control Facility provided by Denison, English River First Nation indicated that they had no comments or recommendations.
Sep 29, 2025 Email	Denison offered to share the Wheeler River Project Caribou Mitigation Plan with English River First Nation.

Kineepik Métis Local #9

Date/Method	Event Summary
Sep 9, 2025 Application	In advance of formally filing with the Province of Saskatchewan, Denison provided Kineepik Métis Local #9 and the Northern Village of Pinehouse with the Application to Construct a Pollutant Control Facility for the Wheeler River Project and provided a timeline for comments and recommendations and the resolution of any outstanding items prior to formal filing.
Sep 22, 2025 Email	In response to the draft Application to Construct a Pollutant Control Facility provided by Denison, Kineepik Métis Local #9 / the Northern Village of Pinehouse indicated that they had no comments or recommendations.
Sep 29, 2025 Email	Denison offered to share the Wheeler River Project Caribou Mitigation Plan with KML
Nov 21, 2025 Email	Denison provided Kineepik Métis Local #9 with the draft Caribou Mitigation Plan for comments.

Birch Narrows Dene Nation

Date/Method	Event Summary
Sep 15, 2025 Email	Birch Narrows Dene Nation requested study area shapefiles relative to the Project area, Local Study Area, and Regional Study Area depicted in the Indigenous Land and Resource Use section of the Wheeler River Environmental Impact Statement.
Sep 22, 2025 Email	At the request of Birch Narrows Dene Nation, Denison provided shapefiles relative to the study area for Indigenous Land and Resource Use specified in the Wheeler River Project Environmental Impact Statement.
Aug 29, 2025 Letter	In a letter from Birch Narrows Dene Nation sent to Denison, the Canadian Nuclear Safety Commission, and the Saskatchewan Ministry of Environment, Birch Narrows Dene Nation responded to Denison's July 7, 2025 letter and notified that it considers the Crown's duty to consult unfulfilled for the Project.
Sep 11, 2025	The CNSC responded to Birch Narrows Dene Nation's Aug 29, 2025 letter.
Oct 7, 2025 Email	Birch Narrows Dene Nation informed Denison that they are working with the Canadian Nuclear Safety Commission on a process for sharing Indigenous Knowledge related to the Wheeler River Project to support the CNSC's understanding of potential impacts to Birch Narrows Dene Nation's Aboriginal and Treaty Rights.
Oct 9, 2025 Letter	The Saskatchewan Ministry of Environment responded to Birch Narrows Dene Nation's August 29, 2025 letter.
Oct 20, 2025 Email	Denison provided Birch Narrows Dene Nation with a Non-Disclosure Agreement for execution, indicating that Denison is not and has never been dismissive of the rights or interests of Birch Narrows Dene Nation or any other Indigenous Peoples and has consistently and respectfully engaged with Birch Narrows Dene Nation in accordance with direction from the Canadian Nuclear Safety Commission and Saskatchewan Ministry of Environment, and consistent with Denison's Indigenous Peoples Policy.
Oct 24, 2025 Letter	Denison provided further detailed technical responses to Birch Narrows Dene Nation's outstanding issues and concerns following an initial response provided by Denison July 3, 2025. Denison additionally responded to Birch Narrows Dene Nation's August 29, 2025, letter, indicating that Denison remains interested in engaging with Birch Narrows Dene Nation in respect of the current Project and in the next phases of Project approval and understanding BNDN's interest in respect of the Project.
Nov 19, 2025 Email	Denison requested an update from Birch Narrows Dene Nation in relation to the Non-Disclosure Agreement that was shared by Denison the previous month to facilitate potential future sharing of Indigenous Knowledge.
Nov 19, 2025 Email	Birch Narrows Dene Nation requested to meet virtually with Denison, indicating the Canadian Nuclear Safety Commission's encouragement to do so following Birch Narrows Dene Nation's meetings with the CNSC. Denison and Birch Narrows Dene Nation worked to determine a suitable meeting time.
Nov 20, 2025 Email	Denison and Birch Narrows Dene Nation set a time to virtually meet to discuss Birch Narrows Dene Nation's concerns with respect to the Project.
Nov 25, 2025 Meeting	Denison and Birch Narrows Dene Nation had a virtual meeting to discuss Birch Narrows Dene Nation's interests with respect to the Project. BNDN appreciated Denison's proposal to formally request the Province include BNDN in Eastern Athabasca Regional Monitoring Program, along with Denison's offer to collaborate on independent environmental monitoring. Denison appreciated this opportunity to meet with BNDN, and is hopeful the parties will continue to advance further positive discussions in the near future.

Lac La Ronge Indian Band

Date/Method	Event Summary
Aug 7, 2025 Email	Lac La Ronge Indian Band requested shapefiles of the Wheeler River Project boundary from Denison.
Aug 11, 2025 Email	At the request of Lac La Ronge Indian Band, Denison provided shapefiles of the Wheeler River Project boundary.
Sep 16, 2025 Email	Lac La Ronge Indian Band requested study area shapefiles relative to Indigenous Land and Resource Use study areas specified in section 11 of the Wheeler River Environmental Impact Statement.
Sep 22, 2025 Email	At the request of Lac La Ronge Indian Band, Denison provided shapefiles relative to the study area for Indigenous Land and Resource Use specified in the Wheeler River Project Environmental Impact Statement.

Peter Ballantyne Cree Nation

Date/Method	Event Summary
Aug 11, 2025 Letter	Denison responded to Peter Ballantyne Cree Nation's document titled "PBCN Preliminary Comments on Technical Comments" regarding water quality and freshwater resources, environmental monitoring and participation, and cultural and environmental impacts.
Aug 20, 2025	Denison and PBCN executed an Environmental Monitoring and Engagement Agreement for the Wheeler River Project.
Aug 22, 2025 Letter	Denison sent a letter to Peter Ballantyne Cree Nation in relation to the finalization of the Environmental Monitoring and Engagement Agreement for the Wheeler River Project.
Sep 29, 2025 Email	Denison offered to share the draft Woodland Caribou Mitigation Plan for the Wheeler River Project with Peter Ballantyne Cree Nation.

Métis Nation - Saskatchewan

Date/Method	Event Summary
Sep 18, 2025 Email	Métis Nation - Saskatchewan shared information on additional traditional land use regarding the Wheeler River Project.

Appendix B: Support for the Wheeler River Project

Indigenous Nations which have provided their free, prior and informed consent to and support for the Project:

1. English River First Nation;
2. Kineepik Métis Local #9;
3. Hatchet Lake Denesuline First Nation; *
4. Black Lake Denesuline First Nation; *
5. Fond du Lac Denesuline First Nation;*
6. Uranium City, Local 50;†
7. Stony Rapids, Local 80;†
8. Weyakwin, Local 16;†
9. La Ronge, Local 19; †
10. Timber Bay, Local 20;†
11. Patuanak, Local 82;†
12. Île-à-la-Crosse, Local 21;†
13. Canoe River, Local 174;†
14. Jan's Bay, Local 38;†
15. Beauval, Local 37;†
16. Cole Bay, Local 41;†
17. Dore/Sled Lake, Local 67;† and
18. Green Lake, Local 5.†

Indigenous organizations which have provide their consent to and support for the Project:

1. Métis Nation – Saskatchewan; †
2. Ya'thi Néné Lands and Resource Office;*
3. Northern Region 1;† and
4. Northern Region 3.†

Northern communities which have provided their consent to and support for the Project:

1. Northern Settlement of Camsell Portage; *
2. Northern Hamlet of Stony Rapids; *
3. Northern Settlement of Uranium City; *
4. Northern Settlement of Wollaston Post; *
5. Village of Pinehouse;
6. Northern Village of Île-à-la-Crosse;
7. Northern Village of Beauval;
8. Northern Hamlet of Cole Bay; and
9. Northern Hamlet of Jans Bay.

* Subject to ratification of the Nuhenéné Benefit Agreement by YNLR, the Athabasca Communities and Fond du Lac Denesuline First Nation.

† Subject to ratification of the Impact Benefit Agreement by the Métis Nation.

Appendix C: Records of Engagement

From: [Carolanne Inglis-McQuay](#)
To: [Chief](#)
Cc: [John Glover](#); [Andrew Bubar](#); [Keegan McGrath](#); [Ryan Smith](#)
Subject: RE: [**]BNDN - Wheeler River - Rescission of Letter Dated January 16, 2024
Date: Wednesday, March 12, 2025 12:10:00 PM
Attachments: [20250312-LTR-DEN_BNDN-CorrMarch3_25.pdf](#)

Dear Chief Sylvestre:

Please find attached a letter on behalf of Janna Switzer, Denison's Vice President of Environment, Sustainability and Regulatory in response to correspondence Denison received from you on March 3, 2025.

Carolanne

Carolanne Inglis-McQuay

Director, Sustainability

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

345 4th Avenue South

Saskatoon, SK, Canada, S7K 1N3



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From: Ryan Smith <ryan@tamarackenvironmental.ca>

Sent: March 4, 2025 7:57 AM

To: Carolanne Inglis-McQuay <cinglismcquay@denisonmines.com>

Cc: John Glover <john@tamarackenvironmental.ca>; Andrew Bubar <andrew@tamarackenvironmental.ca>; Keegan McGrath <keegan@tamarackenvironmental.ca>; Chief <chief1@birchnarrows.ca>

Subject: [**]BNDN - Wheeler River - Rescission of Letter Dated January 16, 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.

Hi Carolanne,

Please find attached a rescindment letter concerning a previous letter sent on January 16, 2024, to Janna Switzer regarding the Wheeler River Project. Kindly forward it as needed.

Thanks,
Ryan Smith

Ryan Smith BA, Cert. ENV IMP.
Wildlife Biologist
Tamarack Environmental Associates Inc.
ryan@tamarackenvironmental.ca

From: [Carolanne Inglis-McQuay](#)
To: [Executive Secretary](#)
Cc: [Peter A. Beatty](#); [Ben Merasty](#); [Ted Merasty](#); [Chani Campbell](#); [Janna Switzer](#); [David Cates](#); [Millen, Roy](#); [Vreugde, Matthew](#)
Subject: RE: [**]Re: Engagement for the Wheeler River Project
Date: Tuesday, May 13, 2025 11:41:00 AM
Attachments: [20250512-LTR-DEN_PBCN-Engagement_Activities.pdf](#)
Importance: High

Good morning.

On behalf of Janna Switzer, please find attached correspondence responding to your letter of April 8, 2025.

Sincerely,
Carolanne

Carolanne Inglis-McQuay

Director, Sustainability

t: 306-652-8200 x 128 | f: 306-652-8202
345 4th Avenue South
Saskatoon, SK, Canada, S7K 1N3



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From: Executive Secretary <executivesecretary@pbcn.ca>
Sent: April 8, 2025 2:20 PM
To: Carolanne Inglis-McQuay <cinglismcquay@denisonmines.com>
Cc: Peter A. Beatty <chiefbeatty@sasktel.net>; Ben Merasty <bmerasty@pbcn.ca>; Ted Merasty <tmerasty@pbcn.ca>; Chani Campbell <CCampbell@arlaw.ca>; Janna Switzer <jswitzer@denisonmines.com>
Subject: [**]Re: Engagement for the Wheeler River Project

Some people who received this message don't often get email from executivesecretary@pbcn.ca. [Learn why this is important](#)

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Please see the attached communication regarding the Wheeler River Project from

Peter Ballantyne Cree Nation.

Regards,

Pauline Bedard - Executive Secretary

Peter Ballantyne Cree Nation

Chief Joseph Custer I.R #201

2300 - 10th Avenue West, P.O Box 2320

Prince Albert, Saskatchewan

S6V 6Z1

Ph: 306.953.4400

Cell: 639.533.2510

Fax: 306.953.4420

Email: executivesecretary@pbcn.ca



From: Chani Campbell <CCampbell@arlaw.ca>

Sent: April 7, 2025 7:55 PM

To: Ben Merasty <bmerasty@pbcn.ca>; Ted Merasty <tmerasty@pbcn.ca>; Executive Secretary <executivesecretary@pbcn.ca>

Cc: PBCN Lands Dept <pbcnlandsdept@pbcn.ca>; Margaret Rosling <MRosling@arlaw.ca>

Subject: RE: Engagement for the Wheeler River Project

Hi Ben & Ted,

I am attaching a draft response for your review and consideration. I am inviting Denison to enter into a capacity funding agreement and renew its consultation efforts.

Pauline, could you kindly arrange for Ben to sign the attached and send it back to Janna Switzer c/o Carolanne Inglis-McQuay.

Thanks kindly,

Chani Campbell

Aldridge + Rosling LLP
Barristers & Solicitors
Suite 1320 - 999 W. Hastings St.
Vancouver, BC, V6C 2W2
Ph: 604.605.5555 ext. 232 | Fax: 604.684.6402
Email: ccampbell@arlaw.ca

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From: Ted Merasty <tmerasty@pbcn.ca>
Sent: Tuesday, April 1, 2025 10:52 AM
To: Margaret Rosling <MRosling@arlaw.ca>
Cc: Chani Campbell <CCampbell@arlaw.ca>; PBCN Lands Dept <pbcnlandsdept@pbcn.ca>
Subject: FW: Engagement for the Wheeler River Project
Importance: High

From: Carolanne Inglis-McQuay <cinglismcquay@denisonmines.com>
Sent: Tuesday, April 1, 2025 11:32 AM
To: Ben Merasty <bmerasty@pbcn.ca>
Cc: Ted Merasty <tmerasty@pbcn.ca>; Janna Switzer <jswitzer@denisonmines.com>
Subject: Engagement for the Wheeler River Project
Importance: High

Some people who received this message don't often get email from cinglismcquay@denisonmines.com. [Learn why this is important](#)

Dear Ben Merasty:

On behalf of Janna Switzer, please find attached correspondence related to engagement for the Wheeler River Project.

Sincerely,
Carolanne Inglis-McQuay

Carolanne Inglis-McQuay
Director, Sustainability

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

345 4th Avenue South
Saskatoon, SK, Canada, S7K 1N3



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From: [Ryan Smith](#)
To: [Way, Jessica](#); justin.mckeown@cnscccsn.gc.ca; [Janna Switzer](#)
Cc: [Chief Jonathon P Sylvestre](#); [Trevor Moberly](#); robert.sylvester@birchnarrows.ca; kimsylvestre@birchnarrows.ca; WheelerRiver@cnscccsn.gc.ca; conrad.sylvester@birchnarrows.ca; [John Glover](#); [Carolanne Inglis-McQuay](#)
Subject: [**]Birch Narrows Dene Nation – Withdrawal of Support Letters and Outstanding Concerns on the Wheeler River Project
Date: Monday, May 26, 2025 12:42:50 PM
Attachments: [BNDN Denison WheelerRiver TBLResponses 2025.05.26 FINAL.pdf](#)

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Dear Ms. Way, Mr. McKeown, and Ms. Switzer,

On behalf of Birch Narrows Dene Nation, please find attached a letter regarding the Nation's withdrawal of support for the Wheeler River Project and outlining key outstanding concerns.

Regards,
Ryan

Ryan Smith BA, Cert. ENV IMP.

Wildlife Biologist

Tamarack Environmental Associates Inc.

ryan@tamarackenvironmental.ca

From: [Carolanne Inglis-McQuay](#)
To: [Chief](#)
Cc: [Janna Switzer](#); [David Cates](#); [Way, Jessica](#); [McKeown, Justin](#); [Dereniowski, Jeff ENV](#)
Subject: Correspondence from Denison in response to letter from Birch Narrows First Nation on May 26, 2025
Date: Thursday, July 3, 2025 12:54:00 PM
Attachments: [20250703-LTR-DEN_BNDN-Response_Corr20250526.pdf](#)
[20250312-LTR-DEN_BNDN-CorrMarch3_25.pdf](#)
Importance: High

Dear Chief Sylvestre:

On behalf of Janna Switzer, Denison's Vice President, Environment, Sustainability & Regulatory, please find attached correspondence in response to your letter dated May 26, 2025 to the Canadian Nuclear Safety Commission, and copied to Denison. Also attached is the correspondence sent to Birch Narrows First Nation from Denison on March 12, 2025 as referenced in this correspondence.

Should you have any questions, please do not hesitate to contact me.

Sincerely,
Carolanne

Carolanne Inglis-McQuay

Director, Sustainability

t: 306-652-8200 x 128 | f: 306-652-8202
345 4th Avenue South
Saskatoon, SK, Canada, S7K 1N3



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From: [Carolanne Inglis-McQuay](#)
To: [Ted Merasty](#)
Cc: [Chani Campbell](#); [Millen, Roy](#); [Janna Switzer](#); [David Cates](#)
Subject: Correspondence from Denison on PBCN Technical Comments in respect of the Wheeler River Project
Date: Monday, August 11, 2025 1:03:00 PM
Attachments: [20250811-LTR-DEN_PBCN-Technical Comments.pdf](#)

Dear Ted:

Please find attached correspondence from Ms. Janna Switzer, Vice President Environment Sustainability & Regulatory at Denison Mines, in respect of Peter Ballantyne Cree Nation's Technical Comments on the Wheeler River Project.

Have a good day,
Carolanne

Carolanne Inglis-McQuay

Director, Sustainability

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

345 4th Avenue South

Saskatoon, SK, Canada, S7K 1N3



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Denison Mines Corp.
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Saskatoon, SK S7K 1N3
T: 306-652-8200

www.denisonmines.com

August 22, 2025

Ted Merasty
Peter Ballantyne Cree Nation
Chief Joseph Custer Reserve
#2300 – 10th Avenue West
PO Box 2320 Prince Albert, SK S6V 6Z1

Re: Peter Ballantyne Cree Nation and Denison Mines Corp.'s Environmental Monitoring and Engagement Agreement

Dear Mr. Merasty,

I am writing to you to express Denison's appreciation to Peter Ballantyne Cree Nation ("PBCN") and your team in terms of finalizing our Environmental Monitoring and Engagement Agreement. It was important for us to understand the areas of significant interest to PBCN in relation to the Wheeler River Project, to collaborate on an approach that would work to mitigate those areas of interest, and formally agree on next steps between us.

As I noted in my last letter on August 11, 2025, we are committed to continuing engagement on the Wheeler River Project with PBCN, and at your convenience would welcome the opportunity to meet with your team to confirm our responses to other technical issues PBCN has raised over the past few months. Please let me know if this is of interest to you, and I will have my staff coordinate with you.

Finally, consistent with our Environmental Monitoring and Engagement Agreement, I note that Denison will provide PBCN with the funding committed to within 30 days of the effective date. To ensure timely payment, please confirm with Carolanne Inglis-McQuay, Denison's Director of Sustainability (cinglismcquay@denisonmines.com) the preferred details for payment (i.e. electronic transfer, cheque, etc) and the entity to whom payment will be made.



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On behalf of the team that has worked with you over the years, I wish to express my gratitude to PBCN for your engagement with Denison on the Wheeler River Project, and your willingness to identify key areas of interest for Denison to meaningfully respond to in a manner acceptable to PBCN.

I wish you an excellent remainder of the summer and look forward to hearing from you at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Janna Switzer', with a stylized flourish at the end.

Janna Switzer
Vice President, Environment, Sustainability & Regulatory

Cc: Chani Campbell, Aldridge + Rosling LLP
David Cates, President and Chief Executive Officer, Denison
Carolanne Inglis-McQuay, Director, Corporate Social Responsibility, Denison
Roy Millen & Matthew Vreugde, Blake, Cassels & Graydon LLP



Ministry of Environment
Environmental Assessment and Stewardship
3211 Albert Street
REGINA Canada S4S 5W6
Phone: 306-787-6132

EASB File #: 2019-005
CRM #: 10032532

October 9, 2025

Chief Jonathon Sylvestre
Birch Narrows Dene Nation
Turnor Lake, Saskatchewan S0M 3E0

Re: Denison Mines Wheeler River Project

Dear Chief Jonathon Sylvestre:

Thank you for your letter dated August 29th, 2025 regarding the Denison Mines Corporation (Denison) Wheeler River Project (the project).

The Government of Saskatchewan's implementation of the duty to consult is outlined in the *First Nation and Métis Consultation Policy Framework, 2023* (the framework). The framework states that the province will consult with and accommodate, as appropriate, First Nations and rights-bearing Métis communities in advance of actions or decisions which may adversely impact Aboriginal or Treaty rights.

The duty to consult for the project was assessed under the province's framework in March 2019 after Denison self-declared the project as a development under *The Environmental Assessment Act* (the Act), therefore requiring an environmental impact assessment. An initial list of First Nation and Métis communities to be consulted for the project was identified based on government's understanding of traditional territories that coincided with the geographic area of the project.

Throughout the assessment process, the ministry considered any new information brought forward regarding the potential for adverse impacts to Treaty and Aboriginal rights. The ministry did not receive specific information regarding Birch Narrows Dene Nation's (BNDN) land use and exercise of rights in the proposed project area while the assessment was underway. The ministry understands that Denison engaged with BNDN during the assessment and worked to address concerns identified by your community.



On July 31, 2025, the Minister of Environment granted Denison approval to proceed with the project, subject to the terms and conditions which form part of the Ministerial Approval. As outlined in the environmental impact statement for the project, Denison will be required to conduct environmental monitoring to ensure effects to air, vegetation, water, and wildlife meet regulatory requirements. Denison will also be required to provide a summary of monitoring and follow up program results to interested Indigenous and non-Indigenous communities on an annual basis or as otherwise agreed upon by the proponent and communities.

Although the project has been approved by the Minister under *The Environmental Assessment Act*, the project is required to proceed through subsequent licensing and permitting phases before beginning construction. This includes negotiating a mineral surface lease agreement (MSLA) with the ministries of Environment and Government Relations. The MSLA aims to help residents of Saskatchewan's north benefit from mining operations in their region.

Duty to consult obligations will continue to be assessed throughout subsequent permitting processes. Questions related to provincial project permitting can be directed to Collin McGuire at (306) 221-8208 or collin.mcguire@gov.sk.ca.

If you have questions or require any additional clarification, please contact Jeff Dereniwski at (306) 787-5971 or jeff.dereniwski@gov.sk.ca.

Sincerely,



for:

Jeff Dereniwski
Senior Environmental Assessment Administrator

Enclosure: Ministerial Decision
Reasons for Decision

cc: John Glover, Tamarack Environmental
Jes Way, Canadian Nuclear Safety Commission
Janna Switzer, Denison Mines
Collin McGuire, Environmental Protection, Ministry of Environment

**PROVINCE OF SASKATCHEWAN
MINISTRY OF ENVIRONMENT
NOTICE OF MINISTERIAL DECISION
PURSUANT TO SECTION 15
*THE ENVIRONMENTAL ASSESSMENT ACT***

**DENISON MINES CORPORATION
WHEELER RIVER PROJECT**

WHEREAS:

- A. Pursuant to subsection 8(1) of *The Environmental Assessment Act* (the Act), Denison Mines Corporation (the proponent) applied for ministerial approval to construct, operate and decommission a new uranium mine and processing plant in the eastern Athabasca Basin on Crown land approximately 35 kilometres northeast of the existing Key Lake Operation in northern Saskatchewan.
- B. Pursuant to section 10 of the Act, the Minister of Environment (the Minister) gave notice of the assessment to be conducted.
- C. Pursuant to clause 9(1)(b) of the Act, an environmental impact statement, consisting of a document entitled "Wheeler River Project Final Environmental Impact Statement" dated October 2024 (the statement), was submitted to the Minister.
- D. Pursuant to section 11 of the Act, the Minister has reviewed the statement and has made the statement and review available for public inspection.
- E. The Minister is satisfied that all the requirements of the Act have been met, including those required of the proponent, and has concluded that the development ought to be approved subject to terms and conditions.

NOW THEREFORE TAKE NOTICE THAT, pursuant to clause 15(1)(a) of the Act, Ministerial Approval is hereby given to the proponent to proceed with the development subject to the following terms and conditions:

- 1. The proponent shall proceed with the development in the manner described in the statement except where alterations are required by the subsequent terms and conditions of this approval.
- 2. The proponent shall inform the Minister, in the manner described in subsection 16(1) of the Act, of any change to the development that does not conform to the terms and conditions of this approval.

3. The proponent shall follow the requirements of the laws and regulations of the Province of Saskatchewan, respecting the design, construction, operation, maintenance and decommissioning of the development.
4. This approval is not an environmental approval with respect to any ancillary feature of this development, for example, but not limited to power transmission lines, natural gas pipelines and water supply lines and provincial or rural municipality roads, that is the responsibility of a party other than the proponent. If required, such features will be considered under separate application to be submitted by the responsible party.
5. Where there is discrepancy between a condition of this approval and any document submitted by the proponent, the condition of this approval shall take precedence.
6. The development must commence within five years of the issuance date of this approval. If it has not commenced within five years of the issuance date of this approval, the Minister shall give the proponent 30 days to rectify the breach or to make representations as to why an extension of the five-year time period is warranted. If the breach is not rectified and an extension of time is not granted by the Minister, this approval expires.
7. The proponent shall submit a woodland caribou mitigation and offset plan that utilizes site-specific information to evaluate effects to woodland caribou and includes a plan for habitat offsetting. The plan shall be submitted to the Ministry of Environment, Environmental Assessment and Stewardship Branch (ministry) for approval prior to construction of the project. The plan must ensure that measures are taken to avoid or lessen any adverse effects to woodland caribou and monitor those effects. The plan shall be consistent with the recovery strategy for woodland caribou as well as the provincial woodland caribou range planning process and offsetting policies.
8. The proponent shall submit an updated traffic impact assessment to the Ministry of Highways (Highways) utilizing current traffic volume information to assess impacts to Highway 914 for all stages of the project life. The assessment shall be approved by Highways and submitted to the ministry prior to initiating construction of the project.
9. The proponent shall develop a road maintenance and upgrade cost-sharing agreement in collaboration with Highways. The agreement shall be approved by Highways and submitted to the ministry prior to initiating construction of the project.
10. The proponent shall provide an opportunity for First Nation and Métis communities notified of the provincial duty to consult to review and provide input on the monitoring and follow up programs described in the statement. The proponent shall identify to notified First Nation and Métis communities how their input was considered in program design and provide this information to the ministry for

review.

11. A summary of monitoring and follow up program results shall be provided to interested Indigenous and non-Indigenous communities on an annual basis or as otherwise agreed upon by the proponent and communities. The proponent shall submit a copy of the report(s) provided to communities as well as a summary of ongoing engagement activities and community involvement as part of the annual reporting submitted to the ministry for the life of the project.

12. This Ministerial Approval takes effect on the date of signing.

Dated at Regina, Saskatchewan this 31 day of July, 2025

original signed by

ISSUED BY:

Travis Keisig
Minister of Environment

**REASONS FOR DECISION
MINISTERIAL APPROVAL
PURSUANT TO SECTION 15
*THE ENVIRONMENTAL ASSESSMENT ACT***

**DENISON MINES CORPORATION
WHEELER RIVER PROJECT**

Introduction

In February 2019, Denison Mines Corporation (Denison, the proponent) submitted an application for the Wheeler River Project (the project). Denison self-declared the project a “development” under *The Environmental Assessment Act* (the Act) and requested a ministerial decision under section 15 of the Act. Prior to receiving a decision, the project is required to undergo an environmental impact assessment (assessment). The assessment provides information needed by the Minister of Environment (the Minister) to determine if adequate environmental safeguards are in place for the proposed project to proceed and, if so, under what conditions.

Denison is proposing to construct, operate and decommission a new uranium mine and processing plant in the eastern Athabasca Basin. The project would be located approximately 35 kilometres (km) northeast of the existing Cameco Key Lake Operation in northern Saskatchewan. The project would use an in-situ recovery method with injection and recovery wells and an on-site processing plant. The project would also include access roads, an air strip, accommodation complex, waste and water management infrastructure and supporting facilities.

Application of *The Environmental Assessment Act*

Under subsection 8(1) of the Act, a person shall not proceed with a “development” until ministerial approval has been received. The Act further sets out process requirements for the undertaking of the assessment.

In February 2019, Denison submitted a technical proposal, self-declared the project to be a development and requested approval under section 15 of the Act. Pursuant to section 10 of the Act, public notice of the assessment was shared in local newspapers and on social media channels in June 2019. The project is also subject to a federal impact assessment led by the Canadian Nuclear Safety Commission (CNSC).

A terms of reference for the assessment was approved in May 2019. A draft environmental impact statement (statement) was received in October 2022. Technical review of this document identified environmental and technical issues that required revisions and additional clarification before the assessment process could proceed. Between June and September 2023, Denison provided additional

information to address technical reviewer comments. On July 31, 2024, Denison submitted a statement that was determined to contain adequate information to proceed with public review. Comments received during the technical and public review of the statement allow for an informed decision regarding the technical merits and potential environmental impacts of the project.

On December 4, 2024, Denison submitted an updated statement to the CNSC in support of the federal assessment. This statement was accepted by the CNSC on December 24, 2025. The ministry has reviewed this statement and concluded that revisions made to the statement as part of the federal process have not altered the conclusions or expected impacts of the project.

Ministerial decision options under subsection 15(1) of the Act are:

- (a) Give approval to proceed with the development and impose any terms and conditions considered necessary or advisable; or
- (b) Refuse to approve the development.

The Ministry of Environment (ministry) conducted a detailed analysis of all information presented in the statement. I have carefully considered this analysis and information in the course of reaching my decision on the project.

Duty to Consult

The project triggered a duty to consult with First Nation and Métis communities due to potential impacts to Crown lands and the resources required to hunt, fish and trap for food and carry out traditional uses. Potentially impacted First Nation and Métis communities were identified and notified by the ministry that an assessment was required for the project, consistent with Saskatchewan's *First Nation and Métis Consultation Policy Framework, 2023* (framework).

Denison was assigned procedural aspects of consultation including working with communities to gather information on the potential for adverse impacts to Treaty and Aboriginal rights and traditional use of lands and resources (rights). Denison was required to consult with English River First Nation (ERFN), Ya'thi Néné Land and Resource Office (YNLR) on behalf of Hatchet Lake First Nation and Black Lake Denesuline First Nation, Kineepik Métis Local 9 (KML), and Métis-Nation Saskatchewan (MN-S) on behalf of Patuanak Métis Local 82. Peter Ballantyne Cree Nation (PBCN) provided information to the ministry in October and November 2024 regarding the potential impacts to their rights from the project. On November 8, 2024, PBCN was notified by the ministry of the duty to consult and provided an opportunity to review the statement and provide information on potential impacts to their rights.

Denison consulted with communities where procedural aspects had been assigned between March 2019 and November 2024. Denison worked with communities to share information and provided opportunities for communities to be involved and engaged throughout the assessment. Denison maintained communication with the communities through in-person and remote meetings, workshops and information sessions, emails, letters, surveys and site tours. ERFN, YNLR, KML, and MN-S completed traditional land use studies and this information was utilized to inform the assessment. Denison also engaged with PBCN during this time period to share information on the project.

The review period for the statement provided an opportunity for First Nation and Métis communities to review the statement and consultation record and identify any concerns. KML did not provide a response during the review period but provided a letter of support to the ministry in June 2024. ERFN provided a letter that outlined their satisfaction with the consultation and indicated their support for the project, subject to Denison fulfilling its commitments to the community. ERFN indicated their expectation that engagement with Denison would continue through the life of the project, including on environmental effects monitoring programs.

YNLR provided a response indicating their preference for a more collaborative approach to consultation but did not identify specific concerns with the consultation record. YNLR also identified their disagreement with some of the conclusions of the statement regarding woodland caribou, cumulative effects, and baseline data collection. YNLR identified an interest in continued involvement in environmental monitoring programs, including woodland caribou and water quality.

MN-S provided a response in December 2024 outlining their concerns regarding the consultation record, inclusion of Métis knowledge in the statement, and the potential environmental and socio-economic effects of the project. MN-S requested involvement in the development and implementation of environmental monitoring programs. In February, April, and June 2025, MN-S provided further correspondence, including information on the use of the area by Métis traditional land users. In July 2025, Denison provided a letter indicating agreement between Denison and MN-S to continue to work together collaboratively.

PBCN provided a response outlining their concerns regarding the consultation completed to date with their community. PBCN also identified concerns regarding potential environmental and socio-economic impacts of the project. PBCN identified that their community uses the general project area for fishing (e.g., Wollaston Lake) and general subsistence and harvesting activities and requested to be involved in environmental monitoring programs for the project.

As a condition of this approval, Denison will be required to provide First Nation and Métis communities notified of the duty to consult an opportunity to review and provide input on the project-specific environmental monitoring and follow up

programs outlined in the statement. Annual summaries of monitoring and follow up program results will also be provided by Denison to interested Indigenous and non-Indigenous communities.

The ministry considered the incremental contribution of the project to cumulative impacts on rights from the taking up of Crown lands. Medium to long-term losses of Crown lands were assessed within 100 km of the project using available information on existing Crown land leases, active forestry operations, public roadways, and reasonably foreseeable projects, including the Key Lake mill and McArthur River uranium mine. Within this boundary, approximately 0.03 per cent of land is currently unavailable for the exercise of rights. The project footprint, as proposed, will represent a minor contribution of an additional 0.005 per cent. The ministry acknowledges that Crown work authorizations are not included in this estimate; however, regulatory permitting requirements are expected to avoid or result in short-term limitations to right of access. The project will not result in significant adverse cumulative effects to the exercise of rights.

Based on the commitments in the statement, information provided by First Nations and Métis communities, and the conditions outlined in the Ministerial Approval, I am satisfied that the Government of Saskatchewan has fulfilled its duty to consult and accommodate. Any information received by communities after this decision will be considered by downstream permitting agencies.

Engagement and Public Review

Denison engaged with Indigenous and non-Indigenous communities, land users, organizations, and the public beginning in 2016. Public engagement primarily focused on communities located near existing transportation infrastructure that will be used by the project including the northern villages of Pinehouse Lake (Pinehouse) and Beauval as well as the Northern Hamlet of Patuanak. The Northern Village of Île-à-la-Crosse, the Northern Hamlet of Stony Rapids, and the northern settlements of Uranium City, Camsell Portage, and Wollaston Lake were also engaged.

Key areas of interest identified during the engagement activities included interest in the mining technology being proposed, economic opportunities, transportation routes and traffic impacts, potential impacts to surface and groundwater and nearby waterbodies, impacts to wildlife, cumulative effects, and transparency of environmental monitoring data. The interests, issues, and concerns shared during engagement activities were used to inform the project and assessment. In June 2024, Pinehouse provided a letter of support for the project to the ministry. One comment was received by the ministry from the public regarding the use of a rail line for the project. Denison has committed to continuing engagement throughout the life of the project.

Reasons for Decision

I am satisfied that Denison has met all the requirements of the Act, thereby requiring a decision to be made pursuant to section 15 of the Act. Having made my decision to issue a Ministerial Approval, the Act requires me, pursuant to subsection 15(2), to state the reasons for the decision.

The statement submitted by Denison describes the project and the potential adverse impacts on the environment. Potential impacts considered and discussed in the statement included impacts to the terrestrial, aquatic, atmospheric and acoustic, heritage and socio-economic environments.

Terrestrial Environment

The direct project footprint is expected to be 75 hectares (ha) in size. A maximum project area of 170 ha was assessed to provide a buffer around the anticipated footprint. This maximum disturbance area contains 144.4 ha of upland forest habitat and 0.45 ha of lowland and waterbody habitat. Approximately 24.8 ha of the maximum disturbance area is made up of anthropogenically disturbed land. Denison will undertake progressive reclamation and revegetation of disturbed areas and once operations cease, all areas will be reclaimed. Denison will implement an invasive plant monitoring and management program to minimize effects to vegetation.

Provincially tracked and federally listed species of conservation concern (SOCC) were observed in the project study area. Wildlife habitat, including for woodland caribou and other SOCC, will be lost or altered from the project. Wildlife mortality rates, from interactions such as vehicle-wildlife collisions, are also expected to increase from the project but are anticipated to remain within the range of natural variability. Denison has minimized project effects by reducing the footprint and placing infrastructure on previously disturbed areas. Further mitigations, including development of a wildlife management plan, implementation of the *Activity Restriction Guidelines for Sensitive Species*, and implementation of a traffic/access plan will further reduce effects to wildlife. As condition of this approval, Denison will be required to submit a caribou mitigation and offsetting plan prior to construction. The plan shall utilize quantitative, site-specific information that considers the effects of all project components and includes:

- A description of how the mitigation hierarchy was applied for the project, including measures that will be taken to avoid and/or minimize effects to woodland caribou and their habitat, including restoration of disturbed areas on-site;
- characterization of the residual effects of the project on woodland caribou and their habitat and identification of plans to monitor these residual project effects; and

- a plan for completion of measures that will offset residual adverse effects to woodland caribou and their habitat.

Water and Aquatic Environment

Groundwater discharge to Whitefish Lake will be reduced by project activities but is not anticipated to impact water levels. The project will also change groundwater quality within the mining area. During operation, a water-based acidic mining solution will be injected into the uranium deposit mining area. This solution will be contained in the mining area by the design and operation of the wellfield, as well as a freeze wall that extends into the basement rock.

Prior to decommissioning the freeze wall, Denison will treat the groundwater in the mining area until acceptable decommissioning levels are met. Based on groundwater flow and geochemical modelling, contaminants of potential concern (COPCs) will migrate from the mining area toward Whitefish Lake once the freeze wall is removed. Some COPCs are anticipated to reach Whitefish Lake within 400 years but concentrations were predicted to remain at levels that would not result in environmental risk. Denison will be required to implement a groundwater monitoring program to ensure impacts to groundwater remain within expected ranges as well as develop contingency plans in case of unexpected releases.

As a result of reduced drainage and water withdrawal from Whitefish Lake, Denison has predicted that water flow and levels within the area local to the project will be reduced; however, changes are predicted to be negligible and below natural fluctuations in lake water levels. Effects would be reversible following decommissioning and Denison will implement mitigation measures, including the recycling and reuse of process and site contact water, to minimize effects to surface water.

The project will discharge treated effluent to Whitefish Lake via a diffuser. Surface water constituents in Whitefish Lake will change from effluent release; however, there would be no exceedances of water and sediment quality guidelines in Whitefish Lake outside the mixing zone. Effluent will be required to meet the federal *Metal and Diamond Mining Effluent Regulations* and provincial *Mineral Industry Environmental Protection Regulations*. Areas downstream of Whitefish Lake are expected to meet appropriate benchmarks for the protection of aquatic life.

Minor loss of aquatic habitat will occur in Whitefish Lake from installation of a discharge pipeline and diffuser. Implementation of mitigation measures, including avoiding sensitive timing windows for fish as well as the use of clear span bridges for the two road crossings will minimize impacts to fish and fish habitat. With the implementation of mitigation measures, no significant adverse effects on aquatic populations or communities from project releases were predicted. Denison will be

required to complete monitoring programs for water and sediment quality, benthic invertebrates, and fish and fish habitat for the project.

Atmospheric and Acoustic Environment

The project will result in reduced air quality from existing conditions; however, most criteria air contaminants are predicted to comply with the *Saskatchewan Ambient Air Quality Standards* during all project phases. Infrequent exceedances of 24-hour total suspended particulates and 1-hour NO₂ are predicted beyond the project boundary in all project phases. Infrequent exceedances of 24-hour PM₁₀ were identified for construction and operation. During the operational phase, 24-hour uranium exceedances are expected to be infrequent (less than 0.5 per cent of the time) and limited to within 400 m of the project.

Mitigations that will be utilized to minimize air emissions include application of suppressants to limit dust emissions and use of pollution control technology on process plant exhaust stacks. Denison will also conduct ambient air monitoring and reporting as part of an approved environmental protection plan pursuant to the Industrial Source (Air Quality) chapter of the Saskatchewan Environmental Code.

The project will generate greenhouse gas (GHG) emissions during all phases. During operation the project is anticipated to emit approximately 12,000 tonnes of carbon dioxide equivalent (CO₂e) per year. Facilities that emit more than 10,000 tonnes CO₂e per year are subject to provincial and federal reporting requirements. The Government of Saskatchewan has also developed GHG performance standards for facilities that emit more than 25,000 tonnes of CO₂e per year. Facilities with annual emissions under this threshold may be voluntarily registered. Provincial regulations subject facilities operating in mining sectors to a 15 per cent emissions intensity reduction by 2030.

Noise emissions would increase during construction, operations, and active closure from heavy equipment, site infrastructure such as generators, vehicles and aircraft, cranes and hoists, and conveyors. No exceedances of permissible sound levels are expected at any receptor location included in the assessment; however, daytime sound levels are expected to increase by 5.1 dBA at a seasonal cabin located near highway 914.

Heritage and Socio-Economic Environment

Two heritage resource impact assessments were conducted in 2017 and 2019. Two archaeological sites, consisting of single artifacts, were identified in the project area. The Heritage Conservation Branch (HCB) within the Ministry of Parks, Culture and Sport determined that the sites were of low interpretive value and no further work was required. Denison will implement a heritage resources management plan for the life of the project, which outlines the steps that Denison would take if

additional archaeological sites are identified. These steps include having the archaeological site assessed by a qualified archaeologist, holding discussions with local Indigenous leadership, and implementing mitigation measures as directed by the HCB.

Denison completed a human health risk assessment to evaluate the potential for adverse effects to human health from the release of air and water emissions and potential exposure to project facilities. Incremental cancer risk was not predicted to exceed the Health Canada threshold of 1 in 100,000 and incremental radiation dose was predicted to be below the regulatory public dose limit of 1 mSv/yr. Based on the modelling completed there is a residual effect on human health from exposure to selenium from ingestion of fish at Russell Lake; however, Denison has indicated that a significantly above average amount of fish would need to be consumed (183 kg/year) for this effect to occur. Surface water and fish tissue concentrations in Russell Lake were predicted to remain within acceptable ranges.

On the Key Lake Road north of the Key Lake gatehouse, traffic is expected to increase 23 to 30 per cent (approximately 14 to 18 additional trucks per day). Further south on Highway 914 between the Key Lake gatehouse and Pinehouse, traffic is expected to increase 16 to 40 per cent (14 to 18 trucks per day). As a condition of this approval, Denison is required to complete an updated traffic assessment incorporating current traffic volume information prior to the start of construction. Denison is also required to work with the Ministry of Highways on a road upgrade and maintenance cost-sharing agreement.

The project would generate up to 300 employment opportunities during construction and up to 180 during operations. The province and regional area will benefit from increased employment and business opportunities and taxes generated. Denison has committed to prioritizing local study area residents for employment and developing culturally sensitive employment policies. Denison will also be required to negotiate with the province to develop a surface lease agreement and a human resource development agreement, which would include socio-economic considerations.

Decommissioning, Reclamation and Closure Plan

Decommissioning and reclamation will occur following the 15-year project lifespan. The objectives of decommissioning and reclamation will be to establish a stable landscape capable of supporting a functioning, self-sustaining ecosystem that is safe for human use.

Decommissioning activities will include the remediation of the wellfield area to meet the mining area decommissioning objectives, removal of the freeze wall and re-establishment of the pre-operational groundwater flow regime, removal of process precipitates and decommissioning of the precipitate pond,

decommissioning of injection and recovery wells, removal and disposal of all buildings and structures, closure and decommissioning of the industrial landfill, and removal of all water management infrastructure. The site will then be cleared, leveled, and revegetated. An appropriate financial assurance will be required from Denison to ensure funds are available to carry out decommissioning and reclamation activities.

Conclusion

The ministry and technical reviewers are satisfied the overall environmental impacts of the project are well understood, and that if the mitigations and environmental protection measures outlined in the statement are implemented, and terms and conditions are imposed as presented in my approval, adverse effects can be minimized, and benefits enhanced.

This conclusion is based on the proponent's adherence to the commitments as documented in the statement, on my ability as the Minister of Environment to impose specific conditions at this time, and on the knowledge that additional environmental protection requirements can be imposed through terms and conditions forming parts of permits and licences required by provincial and federal legislation.

The Ministerial Approval for the development includes terms and conditions designed to promote the elimination and control of adverse environmental effects associated with the development. Included are requirements that Denison:

- (a) Proceed with the development in accordance with the statement;
- (b) Provide notification of any change; and
- (c) Follow the requirements of other applicable laws and regulations.

These conditions, plus the measures proposed in the statement, and the regulatory framework applicable to the project, now and in the future, are adequate to address all issues related to the project.

Dated at Regina, Saskatchewan this 31 day of July, 2025

ISSUED BY: original signed by
 Travis Keisig
 Minister of Environment

From: [Carolanne Inglis-McQuay](#)
To: [John Glover](#)
Cc: [Chief Jonathon P Sylvestre](#); [Janna Switzer](#); [McKeown, Justin](#)
Subject: RE: [**]Shapefiles for Land and Resource Use Buffers
Date: Monday, October 20, 2025 2:21:00 PM
Attachments: [20251020-Denison - BNDN NDA \(Execution Version\).pdf](#)
[image002.png](#)
[20251020-Denison - BNDN NDA - TrackedChanges.pdf](#)
[20251020-Denison_BNDN-Clean.docx](#)

Hi John,

We are pleased to hear BNDN is working with the CNSC to establish a process for sharing existing information held by BNDN. As you know, Denison has not been provided with substantive information regarding BNDN land use in the area of the Wheeler River Project despite requesting such information multiple times previously.

While BNDN may take the position that evidence of potential impacts to Aboriginal rights should not be a prerequisite, the consultation process requires such information to identify appropriate mitigation and, if appropriate, accommodation measures. Denison's requests for BNDN to share this information is based on our desire to understand potential impacts of the Project on BNDN's Aboriginal and Treaty rights. Denison is not and has never been dismissive of the rights or interests of BNDN or any other Indigenous peoples. We have consistently and respectfully engaged with BNDN in accordance with direction from the CNSC and Saskatchewan Ministry of Environment, and consistent with our Indigenous Peoples Policy.

As you will see, we have accepted all of your edits other than the removal of section 2.3(c). That deletion would prevent Denison from sharing information with regulators (such as the CNSC), which is contrary to the purpose of the NDA and the consultation process.

Attached is the NDA for execution. Provided this is satisfactory to BNDN, please sign and return the NDA at your earliest convenience.

Carolanne

Carolanne Inglis-McQuay

Director, Sustainability

t: 306-652-8200 x 128 | f: 306-652-8202
 345 4th Avenue South
 Saskatoon, SK, Canada, S7K 1N3



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From: John Glover <john@tamarackenvironmental.ca>
Sent: October 7, 2025 12:00 PM
To: Carolanne Inglis-McQuay <cingleismcquay@denisonmines.com>
Cc: Chief Jonathon P Sylvestre <chief1@birchnarrows.ca>; Janna Switzer <jswitzer@denisonmines.com>; McKeown, Justin <justin.mckeown@csc-ccsn.gc.ca>
Subject: RE: [**]Shapefiles for Land and Resource Use Buffers

Hi Carolanne,

We are currently working with the CNSC—specifically Justin McKeown who is cc'd—on a process for sharing Indigenous Knowledge (IK) related to the Wheeler River Project. The objective is to support CNSC's understanding of potential impacts to BNDN's Aboriginal and Treaty rights. CNSC has indicated that a certain level of information sharing with Denison may also be required as part of this process.

BNDN's position remains that the sharing of Indigenous Knowledge should not be a prerequisite, as the Nation holds established rights under the Constitution and Treaty 10. Further, both CNSC and Denison have already been informed of BNDN's land use and interests in the Project area. It is also important to note that Denison did not fund the Indigenous Knowledge work undertaken and has historically been dismissive of BNDN's rights and interests, this raises concerns about disclosing sensitive/sacred information.

Despite this, BNDN remains committed to working in good faith with all parties to ensure the Crown's Duty to Consult and Accommodate is meaningfully fulfilled. In that spirit, we have provided edits to the NDA previously shared by Denison. This NDA could serve as the basis for any potential future sharing of Indigenous Knowledge, should BNDN choose to proceed.

Thanks,
 John

—
John Glover
 Director
 Tamarack Environmental Associates Inc.
 (519) 272-3498
john@tamarackenvironmental.ca

From: Carolanne Inglis-McQuay <cingleismcquay@denisonmines.com>
Sent: September 15, 2025 5:27 PM
To: John Glover <john@tamarackenvironmental.ca>
Cc: Chief Jonathon P Sylvestre <chief1@birchnarrows.ca>; Janna Switzer <jswitzer@denisonmines.com>
Subject: RE: [**]Shapefiles for Land and Resource Use Buffers

Hi John –

Thanks for your note.

I will look to get these shape files pulled together and sent to you as soon as possible on our side, which may take a few days.

Sincerely,
 Carolanne

Carolanne Inglis-McQuay

Director, Sustainability

t: 306-652-8200 x 128 | f: 306-652-8202
 345 4th Avenue South
 Saskatoon, SK, Canada, S7K 1N3



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From: John Glover <john@tamarackenvironmental.ca>
Sent: September 15, 2025 1:40 PM
To: Carolanne Inglis-McQuay <cingleismcquay@denisonmines.com>
Cc: Chief Jonathon P Sylvestre <chief1@birchnarrows.ca>; Janna Switzer <jswitzer@denisonmines.com>
Subject: [**]Shapefiles for Land and Resource Use Buffers

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.

Hello Carolanne,

We are completing some Dene Knowledge and Land Use work for BNDN. We would like to mirror the Study Areas that Denison used in the Indigenous Land and Resource Use section of the Wheeler River EIS (Section 11 – see map below).

Could you please send us the shapefiles for the ILRU Section:

1. Project Area
2. Local Study Area
3. Regional Study Area

Thank you,
John

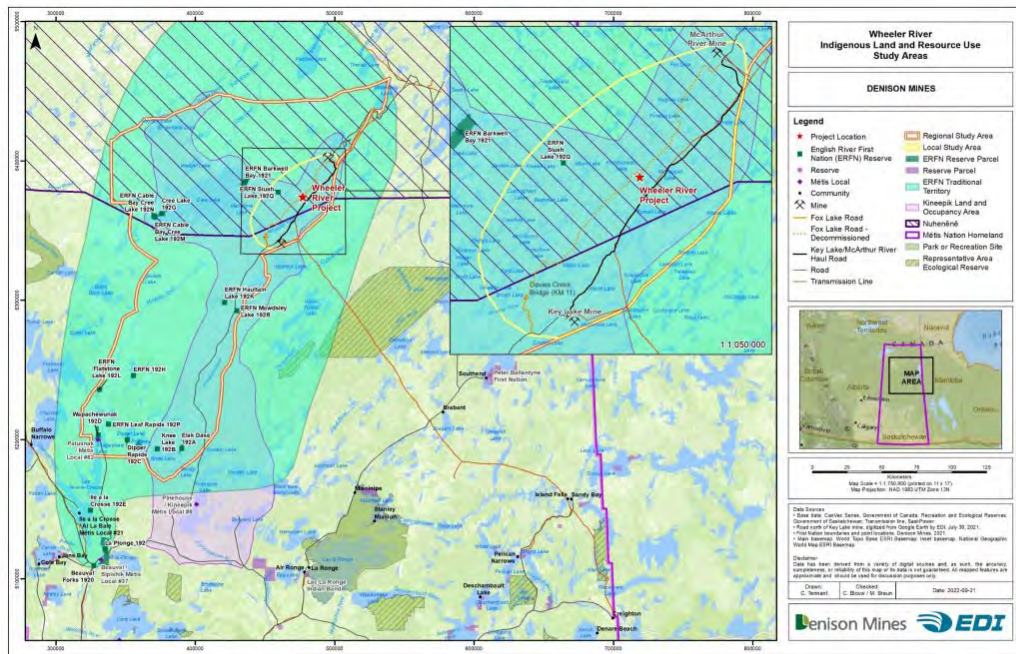
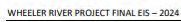


Figure 11.1-4: Indigenous Land and Resource Use Study Areas

John Glover
Director
Tamarack Environmental Associates Inc.
(519) 272-3498
john@tamarackenvironmental.ca

From: [Carolanne Inglis-McQuay](#)
To: [Chief Jonathon P Sylvestre](#)
Cc: [Way, Jessica \(CNSC/CCSN\)](#); [McKeown, Justin \(CNSC/CCSN\)](#); [David Cates](#); [Janna Switzer](#); [Dereniowski, Jeff ENV](#)
Subject: Denison Response to Further Technical Comments from Birch Narrows Dene Nation on the Wheeler River Project
Date: Friday, October 24, 2025 11:25:00 AM
Attachments: [20251024-LTR-DEN_BNDN-FutherResponse_CommentResponse_F.pdf](#)
Importance: High

Dear Chief Sylvestre:

On behalf of Janna Switzer, please find attached correspondence and technical responses from Denison to Birch Narrows in regard to further technical comments provided by Birch Narrows to Denison in May, 2025 on the Wheeler River Project.

Sincerely,
Carolanne Inglis-McQuay

Carolanne Inglis-McQuay

Director, Sustainability

t: 306-652-8200 x 128 | f: 306-652-8202
345 4th Avenue South
Saskatoon, SK, Canada, S7K 1N3



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From: [Carolanne Inglis-McQuay](#)
To: [John Glover](#)
Cc: [Chief Jonathon P Sylvestre](#); [Janna Switzer](#); [McKeown, Justin](#)
Subject: RE: [**]Shapefiles for Land and Resource Use Buffers
Date: Wednesday, November 19, 2025 10:37:00 AM
Attachments: [image002.png](#)

Good morning John – I am following up on my email sent on October 20, in relation to the NDA that was sent through, to facilitate the potential future sharing of Indigenous Knowledge, should BNDN choose to do so with Denison.

Thank you in advance,
 Carolanne

Carolanne Inglis-McQuay
 Director, Sustainability

t: 306-652-8200 x 128 | f: 306-652-8202
 345 4th Avenue South
 Saskatoon, SK, Canada, S7K 1N3

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From: Carolanne Inglis-McQuay <cinglismcquay@denisonmines.com>
Sent: October 20, 2025 2:21 PM
To: John Glover <john@tamarackenvironmental.ca>
Cc: Chief Jonathon P Sylvestre <chief1@birchnarrows.ca>; Janna Switzer <jswitzer@denisonmines.com>; McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>
Subject: RE: [**]Shapefiles for Land and Resource Use Buffers

Hi John,

We are pleased to hear BNDN is working with the CNSC to establish a process for sharing existing information held by BNDN. As you know, Denison has not been provided with substantive information regarding BNDN land use in the area of the Wheeler River Project despite requesting such information multiple times previously.

While BNDN may take the position that evidence of potential impacts to Aboriginal rights should not be a prerequisite, the consultation process requires such information to identify appropriate mitigation and, if appropriate, accommodation measures. Denison's requests for BNDN to share this information is based on our desire to understand potential impacts of the Project on BNDN's Aboriginal and Treaty rights. Denison is not and has never been dismissive of the rights or interests of BNDN or any other Indigenous peoples. We have consistently and respectfully engaged with BNDN in accordance with direction from the CNSC and Saskatchewan Ministry of Environment, and consistent with our Indigenous Peoples Policy.

As you will see, we have accepted all of your edits other than the removal of section 2.3(c). That deletion would prevent Denison from sharing information with regulators (such as the CNSC), which is contrary to the purpose of the NDA and the consultation process.

Attached is the NDA for execution. Provided this is satisfactory to BNDN, please sign and return the NDA at your earliest convenience.

Carolanne

Carolanne Inglis-McQuay
 Director, Sustainability

t: 306-652-8200 x 128 | f: 306-652-8202
 345 4th Avenue South
 Saskatoon, SK, Canada, S7K 1N3

 **Denison Mines**
 TSX: DML | NYSE MKT: DNN
www.denisonmines.com

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From: John Glover <john@tamarackenvironmental.ca>
Sent: October 7, 2025 12:00 PM
To: Carolanne Inglis-McQuay <cinglismcquay@denisonmines.com>
Cc: Chief Jonathon P Sylvestre <chief1@birchnarrows.ca>; Janna Switzer <jswitzer@denisonmines.com>; McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>
Subject: RE: [**]Shapefiles for Land and Resource Use Buffers

Hi Carolanne,

We are currently working with the CNSC—specifically Justin McKeown who is cc'd—on a process for sharing Indigenous Knowledge (IK) related to the Wheeler River Project. The objective is to support CNSC's understanding of potential impacts to BNDN's Aboriginal and Treaty rights. CNSC has indicated that a certain level of information sharing with Denison may also be required as part of this process.

BNDN's position remains that the sharing of Indigenous Knowledge should not be a prerequisite, as the Nation holds established rights under the Constitution and Treaty 10. Further, both CNSC and Denison have already been informed of BNDN's land use and interests in the Project area. It is also important to note that Denison did not fund the Indigenous Knowledge work undertaken and has historically been dismissive of BNDN's rights and interests, this raises concerns about disclosing sensitive/sacred information.

Despite this, BNDN remains committed to working in good faith with all parties to ensure the Crown's Duty to Consult and Accommodate is meaningfully fulfilled. In that spirit, we have provided edits to the NDA previously shared by Denison. This NDA could serve as the basis for any potential future sharing of Indigenous Knowledge, should BNDN choose to proceed.

Thanks,
 John

—
John Glover
 Director
 Tamarack Environmental Associates Inc.
 (519) 272-3498
john@tamarackenvironmental.ca

From: Carolanne Inglis-McQuay <cinglismcquay@denisonmines.com>

Sent: September 15, 2025 5:27 PM
 To: John Glover <john@tamarackenvironmental.ca>
 Cc: Chief Jonathon P Sylvestre <chief1@birchnarrows.ca>; Janna Switzer <jswitzer@denisonmines.com>
 Subject: RE: [*]Shapefiles for Land and Resource Use Buffers

Hi John –

Thanks for your note.

I will look to get these shape files pulled together and sent to you as soon as possible on our side, which may take a few days.

Sincerely,
 Carolanne

Carolanne Inglis-McQuay
 Director, Sustainability

t: 306-652-8200 x 128 | f: 306-652-8202
 345 4th Avenue South
 Saskatoon, SK, Canada, S7K 1N3



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From: John Glover <john@tamarackenvironmental.ca>
 Sent: September 15, 2025 1:40 PM
 To: Carolanne Inglis-McQuay <cingleismcquay@denisonmines.com>
 Cc: Chief Jonathon P Sylvestre <chief1@birchnarrows.ca>; Janna Switzer <jswitzer@denisonmines.com>
 Subject: [*]Shapefiles for Land and Resource Use Buffers

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Hello Carolanne,

We are completing some Dene Knowledge and Land Use work for BNDN. We would like to mirror the Study Areas that Denison used in the Indigenous Land and Resource Use section of the Wheeler River EIS (Section 11 – see map below).

Could you please send us the shapefiles for the ILRU Section:

1. Project Area
2. Local Study Area
3. Regional Study Area

Thank you,
 John

WHEELER RIVER PROJECT FINAL EIS – 2024

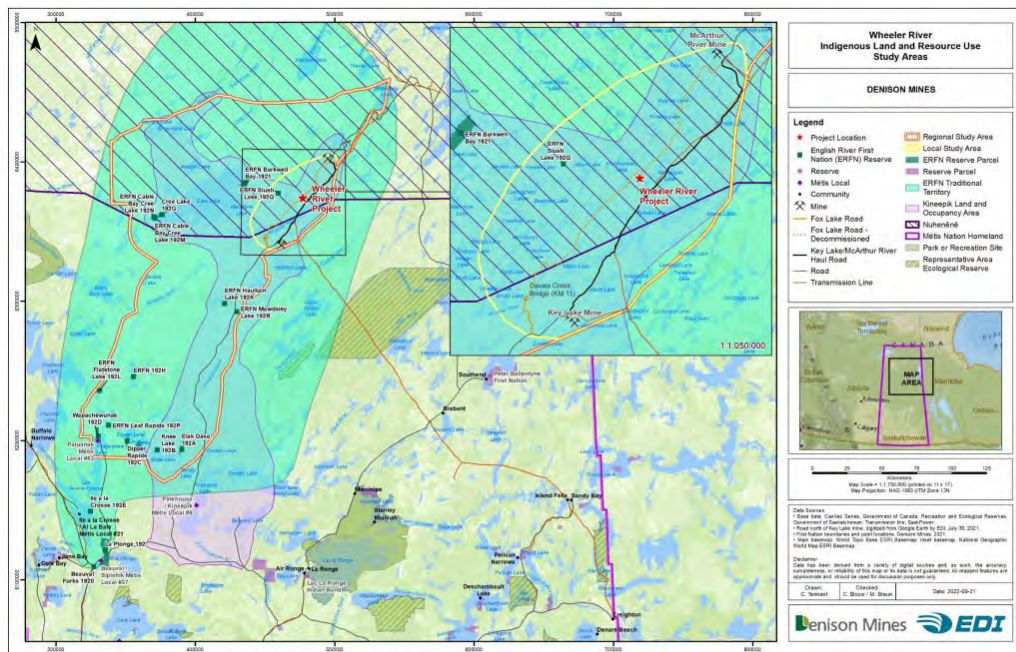


Figure 11.1-4: Indigenous Land and Resource Use Study Areas

ROC 1275

Director
Tamarack Environmental Associates Inc.
(519) 272-3498
john@tamarackenvironmental.ca



ROC 1283

Birch Narrows Dene Nation

General Delivery
Turnor Lake, SK
S0M 3E0

August 29, 2025

Janna Switzer
VP Environment,
Sustainability & Regulatory
Denison Mines Corp.
jswitzer@denisonmines.com

Jessica Way
Environmental Review
Specialist
Canadian Nuclear Safety
Commission
jessica.way@cnscccsn.gc.ca

Jeff Dereniowski
Sr. Environmental
Assessment Administrator,
Saskatchewan Ministry of
Environment
jeff.dereniowski@gov.sk.ca

Subject: Denison Mines Wheeler River Project – Failure of the Crown’s Duty to Consult and Accommodate Birch Narrows Dene Nation

Hello,

This letter serves as both a response to Denison Mines Corp.’s letter from July 7, 2025, and as a formal notice to the Province of Saskatchewan and the Canadian Nuclear Safety Commission (CNSC) that Birch Narrows Dene Nation (BNDN) considers the Crown’s constitutional duty to consult and accommodate to be unfulfilled with respect to the Wheeler River Project (the “Project”). The positions advanced by Denison, and the Province’s and CNSC’s apparent endorsement of those positions, represent a breach of the Crown’s obligations under section 35 of the *Constitution Act, 1982*, Treaty 10, and Canada’s commitments under the *United Nations Declaration on the Rights of Indigenous Peoples Act (2021)*.

Denison’s position, as stated in the letter, that BNDN is not owed “deep consultation or engagement” is not only wrong—it is unlawful, offensive, and a direct denial of our existence as a Treaty Nation. It strikes at the very heart of reconciliation, and it will not stand unchallenged.

Denison’s so-called “systematic and comprehensive process” is nothing more than a paper exercise designed to exclude inconvenient Nations. It relies on third-party data and bureaucratic boundaries while ignoring the knowledge, presence, and lived reality of our people on the land. No mining company—no matter how long it has held tenure on paper—knows this territory better than the Dene who have lived, hunted, trapped, and protected it since time immemorial. For Denison to claim otherwise because they have owned the property since 2004, is not only absurd, but also deeply insulting.

What makes this situation even more concerning is Denison's claim that its approach has been endorsed by the Province of Saskatchewan and the CNSC. If true, then both the Province and the CNSC have failed in their legal obligations. The Supreme Court of Canada has been unequivocal in *Haida Nation v. British Columbia, Taku River Tlingit, Mikisew Cree, and Rio Tinto Alcan*: the Crown has a duty to consult and accommodate whenever our rights may be impacted. That duty cannot be delegated away to a mining company. By endorsing Denison's erasure of our Nation, the Crown is in breach of its highest constitutional obligations.

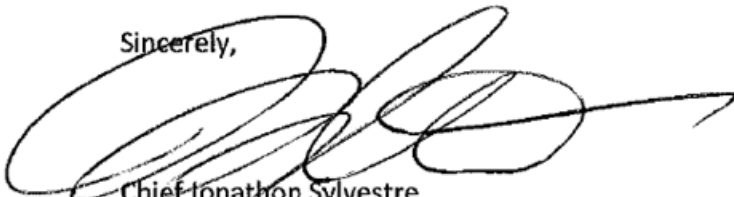
Canada has further committed, through the *United Nations Declaration on the Rights of Indigenous Peoples Act (2021)*, to uphold the standard of free, prior, and informed consent (FPIC). Yet here we face the same old colonial pattern: a corporation decides which Nations count, and the Crown nods along.

BNDN has not been silent. Since May 2021 we have consistently raised our rights, our land use, and our environmental concerns. We provided a technical review of the Wheeler River Project identifying serious gaps, and we still await answers to 64 outstanding comments. We are now completing Indigenous Knowledge and land use research, which will confirm what we have said all along: this Project will cause adverse impacts to our Treaty rights, to our way of life, and to the land and waters we hold sacred. If Denison expects BNDN to even consider supporting this Project, then it must mitigate those impacts and accommodate our Nation in a meaningful way. Anything less will never secure our consent.

As it stands, the duty to consult and accommodate has not been met. Denison's dismissive approach, combined with the Province and CNSC's apparent willingness to endorse it, is legally indefensible, ethically shameful, and an assault on Treaty 10 itself. If these failures are not corrected, BNDN will use every tool available to us to ensure that our rights are protected.

Our Treaty rights are not optional, our voice is not expendable, and our people will not be erased. We remain ready to engage in a process rooted in respect, recognition, and reconciliation. But if Denison, the Province, and the CNSC continue down this path of denial, Birch Narrows Dene Nation will stand firm, defend our lands, and uphold our Treaty rights as we have done for generations.

Sincerely,

A large, stylized handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Chief Jonathon Sylvestre
Birch Narrows Dene Nation



September 11, 2025

Chief Jonathan Sylvestre
Birch Narrows Dene Nation
Turnor Lake, Saskatchewan
S0M 3E0

Subject: Denison Mines Wheeler River Project – Failure of the Crown’s Duty to Consult and Accommodate Birch Narrows Dene Nation

Dear Chief Sylvestre:

Thank you for your letter dated August 29th, 2025, addressed to the Canadian Nuclear Safety Commission (CNSC) regarding Birch Narrows Dene Nation’s (BNDN) position on the Denison Wheeler River Project (the Project).

To date, BNDN has not provided CNSC staff or Denison with specific information regarding their land use and exercise of rights in the proposed Project area. CNSC respectfully requests that BNDN share any available land and resource use data to help inform CNSC’s understanding of potential impacts on BNDN’s rights under Section 35 of the *Constitution Act, 1982*. While CNSC staff understand that BNDN is currently collecting Indigenous Knowledge, we kindly request any existing and preliminary information that demonstrates BNDN’s use in the Project area so we are able to understand the potential impacts to BNDN’s Indigenous and/or Treaty rights in the Project area.

Concerning Denison’s consultation and engagement activities with your Nation to date, through discussions with Denison we understand that there appears to be an impasse, particularly over the 64 outstanding comments noted in your letter. It is CNSC staff’s expectation that all parties continue to work through the issues and concerns raised on the Project in good faith and with the mutual goal of achieving consensus. The CNSC does not formerly endorse or refute Denison’s approach to consultation and engagement with BNDN, however CNSC staff encourages BNDN to share their Indigenous Knowledge and land use with Denison so that Denison can properly assess the Project’s potential impacts to BNDN’s rights. To support these discussions, CNSC staff remain open to bilateral and/or trilateral meetings with BNDN and Denison, as necessary. The CNSC is committed to discussing BNDN’s outstanding issues and concerns with you and working together to address them.

CNSC staff will continue to engage in discussions regarding BNDN’s rights and interests as they pertain to the Project in ways that are meaningful to your Nation. We look forward to continuing our

discussions with BNDN in ways that respect BNDN's governance structures, rights and protocols and to build upon the positive work that has been done with your Nation to date. We look forward to the upcoming September 12th meeting, in order to continue discussions on this topic.

Yours sincerely,



Jessica Way
Environmental Review Officer
Environmental Review Division
Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission

c.c./c.c.: CNSC: A. Levine, S. Boser, J. McKeown, P. Burton, K. Gorzkowski, D. Wylie, R. Ringer
Denison: J. Switzer, C. Inglis-McQuay, B. England
Birch Narrows Dene Nation: T. Moberly, T. Campbell, K. McGrath, J. Glover

From: [Millen, Roy](#)
To: [Chani Campbell](#)
Cc: [Vreugde, Matthew](#)
Subject: RE: [**]Re: Engagement for the Wheeler River Project
Date: Wednesday, June 18, 2025 11:46:26 AM

Yes that sounds fine – thanks for checking and for the update. We'll look forward to receiving your cost estimate when available.

Regards,

Roy Millen* (he, him, his)
Partner
roy.millen@blakes.com
T. [+1-604-631-4220](tel:+16046314220)
* law corporation

From: Chani Campbell <CCampbell@arlaw.ca>
Sent: Wednesday, June 18, 2025 10:11 AM
To: Vreugde, Matthew <matthew.vreugde@blakes.com>
Cc: Millen, Roy <roy.millen@blakes.com>
Subject: RE: [**]Re: Engagement for the Wheeler River Project

• External Email | Courrier électronique externe •

Hi Matthew,

I have no substantive comments on this draft. I will likely include the Executive Director of PBCN as a senior representative. I have a Chief & Council meeting scheduled for July 16th.

I should have a more refined cost estimate once our environmental consultants return from the field early next week. In the meantime, could you please confirm whether your client is comfortable with PBCN mentioning at tomorrow's CNSC meeting that PBCN and Denison are collaborating on specific monitoring plans for key country foods and water?

Thanks kindly,

Chani Campbell

Aldridge + Rosling LLP
Barristers & Solicitors
Suite 1320 - 999 W. Hastings St.
Vancouver, BC, V6C 2W2
Ph: 604.605.5555 ext. 232 | Fax: 604.684.6402
Email: ccampbell@arlaw.ca

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From: Vreugde, Matthew <matthew.vreugde@blakes.com>
Sent: Friday, June 13, 2025 10:42 AM
To: Chani Campbell <CCampbell@arlaw.ca>
Cc: Millen, Roy <roy.millen@blakes.com>
Subject: RE: [**]Re: Engagement for the Wheeler River Project

Hi Chani,

Attached is a draft Environmental Monitoring and Engagement Agreement.

As discussed, the Agreement will provide funding to PBCN to support its engagement with Denison regarding the Wheeler River Project and to undertake environmental monitoring activities. To address the concerns and interests expressed by PBCN regarding environmental monitoring, we incorporated general details from the "specific mitigation strategies" document into the Agreement's workplan and budget. We invite PBCN to provide further information regarding the details and estimated costs of such environmental monitoring activities.

Regarding the regional monitoring activities, we spoke with our client and understand this is a provincial program which Denison has agreed to participate in. Our understanding is that the Province of Saskatchewan will likely provide funding to support the participation of interested Indigenous Nations.

We are happy to discuss if you have any questions / feedback.

Thanks,
Matt

Matthew Vreugde (he, him, his)
Associate
matthew.vreugde@blakes.com
T. [+1-604-631-3322](tel:+16046313322)

From: Chani Campbell <CCampbell@arlaw.ca>
Sent: Friday, June 6, 2025 2:32 PM
To: Millen, Roy <roy.millen@blakes.com>
Cc: Vreugde, Matthew <matthew.vreugde@blakes.com>
Subject: RE: [**]Re: Engagement for the Wheeler River Project

• External Email | Courriel électronique externe •

Hi Roy,

Following up on this. PBCN is meeting with CNSC the week of June 16th and it would be nice to update CNSC at that time.

Thanks kindly,

Chani Campbell

Aldridge + Rosling LLP
Barristers & Solicitors
Suite 1320 - 999 W. Hastings St.
Vancouver, BC, V6C 2W2
Ph: 604.605.5555 ext. 232 | Fax: 604.684.6402
Email: ccampbell@arlaw.ca

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From: Chani Campbell
Sent: Tuesday, May 27, 2025 9:08 AM
To: Millen, Roy <roy.millen@blakes.com>
Cc: 'Matthew Vreugde' <matthew.vreugde@blakes.com>
Subject: FW: [**]Re: Engagement for the Wheeler River Project

Hi Roy,

Further to our call last week, I am attaching PBCN's concerns and mitigation strategies which my clients would like to discuss with Denison. Additionally, I believe that you were going to check with your clients regarding the regional monitoring committees which have already been established and how PBCN could participate in those.

Thanks kindly,

Chani Campbell

Aldridge + Rosling LLP
Barristers & Solicitors
Suite 1320 - 999 W. Hastings St.
Vancouver, BC, V6C 2W2
Ph: 604.605.5555 ext. 232 | Fax: 604.684.6402
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From: Chani Campbell
Sent: Friday, May 16, 2025 10:49 AM

To: Roy Millen <roy.millen@blakes.com>
Cc: Matthew Vreugde <matthew.vreugde@blakes.com>
Subject: RE: [**]Re: Engagement for the Wheeler River Project

Hi Roy,

It looks like I am also available at 3:00 p.m. on Tuesday.

Additionally, attached is the mapping prepared by the Firelight Group, based on their interviews with PBCN members. This was provided to CNSC earlier this week and should help clarify the intent behind the phrase “in the vicinity of” as referenced in PBCN’s previous letter of April 8th.

Thanks,

Chani Campbell

Aldridge + Rosling LLP
Barristers & Solicitors
Suite 1320 - 999 W. Hastings St.
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From: Chani Campbell
Sent: Friday, May 16, 2025 9:51 AM
To: Roy Millen <roy.millen@blakes.com>
Cc: Matthew Vreugde <matthew.vreugde@blakes.com>
Subject: Re: [**]Re: Engagement for the Wheeler River Project

Hi Roy,

Apologies, I was reeling this week. I could do Tuesday at 2:00 or Wednesday anytime except between 2:00-4:00.

Do any of those times work?

Thanks,

Chani Campbell

Aldridge + Rosling LLP
Barristers & Solicitors
Suite 1320 - 999 W. Hastings St.
Vancouver, BC, V6C 2W2
Ph: 604.605.5555 ext. 242 | Fax: 604.684.6402
Direct: 604-343-4310
Email: ccampbell@arlaw.ca

Sent from my iPhone

On May 13, 2025, at 2:50 PM, Millen, Roy <roy.millen@blakes.com> wrote:

Chani - I believe you had been in contact with Rochelle Collette of our office previously. She's away on parental leave for another month or so. Do you have time later this week or next Tuesday to discuss?

Roy Millen* (he, him, his)
Partner
roy.millen@blakes.com
T. [+1-604-631-4220](tel:+16046314220)
* law corporation