



CMD 25-H9.REF11 CNSC Staff Submission

Reference Package 11 for CMD 25-H9 CNSC Staff Submission on Denison Mines Licence Application to Prepare Site and Construct the Wheeler River Project

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| Classification | Unclassified |
| Type of CMD | References |
| CMD Number | CMD 25-H9.REF11 |
| Original CMD | CMD 25-H9 |
| Public hearing date | 08 December 2025 |
| PDF e-DOC # | 7605588 |
| Summary | This document contains documents related to the Environmental Assessment process, as posted to the Canadian Impact Assessment Registry, to be placed on the Record for the proceeding. |
| Actions required | There are no actions requested of the Commission. This CMD is in support of the actions and recommendations set out in CNSC staff CMD 25-H9. |



CMD 25-H9.REF11 Soumission par le personnel de la CCSN

Références liées 11 au CMD 25-H9 Soumission par le personnel de la CCSN la demande de Denison Mines visant à préparer le site du projet de Wheeler River et à entamer les activités de construction

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|----------------------------|--|
| Classification | Choisir un niveau de classification |
| Type de CMD | Références |
| Numéro de CMD | CMD 25-H9.REF11 |
| CMD Original | CMD 25-H9 |
| Date de l'audience | 08 décembre 2025 |
| Numéro e-Doc du PDF | 7605588 |
| Résumé | Ce document contient des documents liés au processus d'évaluation environnementale, tels que publiés dans le Registre canadien d'évaluation d'impact, à verser au dossier de l'instance. |
| Mesures requises | Aucune mesure n'est requise de la Commission. Le présent CMD appuie les mesures et les recommandations énoncées dans le CMD CMD 25-H9 du personnel de la CCSN. |



CMD 25-H9.REF11

Reference Package 11 for CMD 25-H9 CNSC Staff Submission on Denison Mines Licence Application to Prepare Site and Construct the Wheeler River Project

Signed by:

X

Dana Beaton
Director General, DERPA

ISR Overview

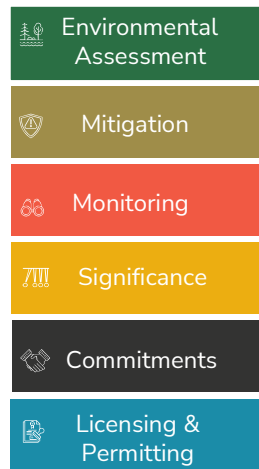


Project Stage



Guidance Materials

Licensing & Permitting



Environmental Assessment & Licensing can be complicated. Let's go over some information to help.



Over the years, we have heard that this is important to you.

"What is the long-term impact to the land?"

"I will consume the animals from my trapline, but there are fewer around than in the past."

"I fish in the area around Wheeler River."

"I might eat some berries while I am walking around."

"I am concerned about traditional land users and wildlife interruption."

"Will hunters and land users be restricted from accessing the area?"

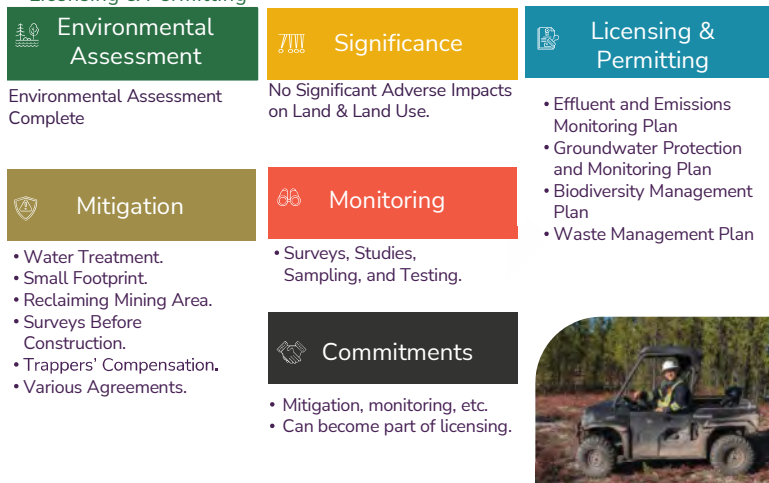
"Our ancestors have lived on our Traditional Territory since time immemorial."

"There are cultural sites and artifacts left throughout the region."

Land & Land Use Activities

Land & Land Use Activities

Licensing & Permitting



Over the years, we have heard that this is important to you.

"All animals are affected by water quality."

"What happens with groundwater monitoring once the mining is done, and the freeze wall comes out?"

"Will you be treating the discharged water?"

"I swim in many different lakes."

"Will the freeze wall affect groundwater?"

"How will you protect the water quality?"








"What happens when the freeze wall melts? Will there be monitoring of groundwater during this?"

"Is there any chance of the wells blowing and contaminating the ground around it?"

Surface & Groundwater

Surface & Groundwater

Licensing & Permitting

| | | |
|---|--|--|
|  Environmental Assessment Environmental Assessment Complete. |  Monitoring <ul style="list-style-type: none"> • Water Testing Before Release • Well Monitoring System • Pipeline Monitoring • Air testing. • Ground Sampling/Testing. |  Licensing & Permitting <ul style="list-style-type: none"> • Waste Management Plan • Effluent and Emissions Monitoring Plan • Groundwater Protection and Monitoring Plan • Environmental Code of Practice |
|  Mitigation <ul style="list-style-type: none"> • Reducing Freshwater Use. • Water Treatment • Recycling Contact Water • Containment • Freeze Wall |  Commitments <ul style="list-style-type: none"> • Mitigation, monitoring, etc. • Can become part of licensing. |  |
|  Significance No Significant Adverse Impacts on Surface Water & Groundwater. | | |

Over the years, we have heard that this is important to you.

"Moose is what is in my freezer. Will the Project interrupt harvesting moose? Will I still be able to safely eat moose that I harvest?"

"Will construction and operation harm moose and caribou populations."










"A lot of people live off the land; will the Project damage the animals?"

"Would the chemicals being transported possibly harm wildlife?"

Wildlife

Wildlife

Licensing & Permitting

| | | |
|--|---|---|
|  Environmental Assessment Environmental Assessment Complete. |  Significance No Significant Adverse Impacts on Land & Land Use. |  Licensing & Permitting <ul style="list-style-type: none"> • Environment Monitoring Plan • Biodiversity Management Plan • Waste Management Program • Facility and Equipment Management Program |
|  Mitigation <ul style="list-style-type: none"> • Small Footprint • Staff Education • Recording Wildlife Observations. • Ongoing Reclamation • Habitat Surveys • No Vegetation Clearing During Denning & Calving • Speed Limits |  Monitoring <ul style="list-style-type: none"> • Wildlife Population Studies/Testing • Fish Population Surveys/Testing • Vegetation Sampling /Testing |  |
|  Mitigation  |  Commitments <ul style="list-style-type: none"> • Mitigation, monitoring, etc.. • Can become part of licensing. | |

Over the years, we have heard that this is important to you.

"Seasonal workers need more opportunities. This will show us that you care."

"What are the economic opportunities? A new and smaller scale mining method can reduce jobs for the community. We need to learn about this kind of mining."

"What is your plan for training and for young people?"

"For this new mining method, are there different types of jobs we should train for?"

"We have been promised jobs in the past, but those promises were not kept. I'd like to see this change. "

"Will you give site specific training, or training that is transferable?"

"When the mine eventually closes a lot of people are going to lose jobs."

"What kind of employment opportunities will we see with Denison?"

Business & Work Opportunities





Business & Work Opportunities

Licensing & Permitting

| | | |
|---|--|--|
|  Environmental Assessment Environmental Assessment Complete. |  Significance No Significant Adverse Impacts on Business/Work Opportunities. Local Northern Saskatchewan communities are expected to experience positive effects. |  Licensing & Permitting <ul style="list-style-type: none"> • Human Performance Program (Human Resource Development Plan) • Training Management Program • Surface Lease Agreement |
|  Mitigation <ul style="list-style-type: none"> • Buying Northern Goods. • Hiring & Training Locals, when possible. |  Monitoring <ul style="list-style-type: none"> • Reporting on employment and business efforts. |  |
|  Mitigation  |  Commitments <ul style="list-style-type: none"> • Mitigation, monitoring, etc. • Can become part of licensing. | |

Licensing and Permitting

Commitments

| | | | |
|---|---|---|---|
|  |  |  |  |
| <ul style="list-style-type: none"> • Develop a Draft Caribou Management Plan with the Ministry of Environment. • Survey before disturbance to inform species specific mitigation. • Monitoring to ensure engineering designs are being met. • Wellfield surface pipes will have secondary containment and a leak detection system. • In ground mining solution and UBS will have three layers of protection. | <ul style="list-style-type: none"> • Liners (such as those used for the industrial wastewater treatment plant precipitate pond, hazardous waste storage pad, and effluent monitoring and release ponds) will be designed based on materials being stored. Performance monitoring will be in place. • Above ground, double walled, fuel storage tanks. • Adjusting and developing mitigation measures as needed, as part of an adaptive management process. | <ul style="list-style-type: none"> • Hazardous substances managed appropriately. Procedures for spill management, handling, and cleanup located in accessible location. • Fresh water wells and surface water intake specifics developed according to best practice and applicable standards. • Treated effluent discharge adhere to approvals and regulations to protect wildlife and water. • Speed limits to reduce dust and protect wildlife. | |



Wheeler River VCs: Ground, Terrain and Soil

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Environmental Assessment Considerations

- Land stability
- Soil quantity, quality and nutrients

Potential Effects

- Activities that could impact land stability, surface drainage patterns, surface erosion potential, soil quality, and soil quantity:
- Clearing, grading, and construction
- Unexpected spills, leaks
- Release of water to groundwater and/or surface water bodies

Reclamation of disturbed areas may result in similar Project-related effects, but to a lesser extent.

Mitigation Measures

- Limit the area of disturbance
- Construction strategies to eliminate or reduce impacts
- Use of existing clearings and previously disturbed land
- Reusing disturbed sources of soil nutrients, generated during construction, for the reclamation process
- Installation of sediment/erosion controls and surface water management features
- Monitoring of open-source dust associated with major earthworks and equipment travel
- Fuel Management and Spill Control Plan in place to respond to unexpected leaks, spills, and releases of materials
- Wherever possible, progressive reclamation will be conducted throughout the life of the Project in relation to landscape features (slope, aspect) and surface drainage patterns

Conclusions

Effects are anticipated to be:

- Low magnitude—within range of natural variations
- Local—limited to areas disturbed by the project
- Medium term—up to, but not including post-decommissioning
- Not significant—residual effects are not expected to alter VCs integrity and sustainability nor their availability to contribute to the environment

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Information provided as of May, 2022

Wheeler River VCs: Wildlife and Birds

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Environmental Assessment Considerations

- Populations and health of wildlife including:
 - Ungulates: Moose, Woodland Caribou
 - Furbearers: Wolverine, Mink, Muskrat
 - Birds: Bald Eagle, Osprey, Common Nighthawk, Short-Eared Owl, Waterbirds, Game Birds, Songbirds, Yellow Rail, Rusty Blackbird, Olive-Sided Flycatcher

Potential Effects

- Activities that could reduce or disturb species of wildlife, birds, or habitats include:
 - Vehicles, equipment, and aircraft traffic
 - Dust
 - Human presence
 - Collisions with equipment and vehicles
 - Entrapment in facilities
 - Exposure to substances in dust
 - Release of Project-related treated effluent
 - Spills of hazardous materials
 - More efficient hunter, trapper, and predator access to the Project area via new access routes
- Changes to surface water quality could affect wildlife habitat and health from water management practices.
- Decommissioning of Project site may result in a continued alteration of wildlife habitat and/or mortality from vehicle-wildlife collisions.

Mitigation Measures – Wildlife Management Plan

- Limit the area of disturbance
- Use of existing clearings and previously disturbed land
- Site clearing scheduled to avoid times when animal and birds are denning, raising, breeding
- Nesting surveys conducted before clearing to identify and establish measures to protect dens, burrows, lodges, nests, and other habitat
- Measure and practices to reduce the generation of dust
- Secondary containment of tanks and pipelines to contain accidental leaks and spills
- Implementation of Fuel Management and Spill Control Plan
- Fencing and monitoring contaminated areas—waste ponds and pools, landfill
- Implementation of Woodland Caribou Management Plan
- Employees trained to minimize their impact on wildlife, such as no littering, respect for wildlife, etc.
- Implementation of speed limits to reduce risk of collisions with wildlife
- Waste and hazardous materials collected and temporarily stored in wildlife-proof containers

Conclusions

- Effects are anticipated to be:
 - Low magnitude—risk of mortality within range of natural variations
 - Regional effect on habitat loss—limited to Project area
 - Local effect on mortality—direct mortality within Project area from vehicle-wildlife collisions, but indirect mortality could extend beyond Project area
 - Medium term for long-term—highest loss of habitat and mortality vehicle-wildlife collisions expected during construction and operation, but may continue during other phases of the project
 - Medium to long term for furbearers, raptors and at-risk bird species—loss of habitat and mortality vehicle-wildlife collisions expected during construction and operation
 - Long term—moderate effects not expected to alter habitat integrity nor wildlife and bird regional populations sustainability

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Wheeler River VC: Aquatic Environment

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Environmental Assessment Considerations

- Fish habitat availability and distribution
- Fish survival and reproduction
- Surface water levels and flow
- Concentration of chemicals and metals in surface water
- Concentration of chemical and metals in aquatic sediments
- Distribution and survival of snails, worms, dragonfly larvae, and other benthic invertebrates

Potential Effects

- Activities that could reduce or disturb aquatic environments, species, or habitats:
 - Modification of fish habitat from disturbances around surface water
 - Erosion and transport of sediments into surface water
 - Water withdrawal from Whitefish Lake
 - Releasing effluent to Whitefish Lake
 - Water management could result in changes to water quality affecting fish, fish habitat, and benthic invertebrates
 - Water management could alter stream flow or lake levels required for fish mobility and productivity
 - Reclamation of disturbed areas could increase sediments in water and change fish habitat

Mitigation Measures

- Limiting duration of in-water work: Conducting work during low-flow periods, and conducting work away from flows when possible
- Avoiding activities in windy or rainy conditions to limit erosion and sedimentation
- Plan activities in waterbodies to limit loss or disturbance to aquatic and sensitive habitat
- Limit shoreline degradation when operating machinery
- Stabilize shorelines to limit erosion and sedimentation by limiting clearing of vegetation and revegetating with native species, wherever possible
- Maintaining routes used for fish passage by designing water intake and treated water discharge locations to protect fish, fish movements, and fish habitats
- Planning to avoid chemicals entering waterways during near-water work
- Implementing an Erosion and Sediment Control Plan

Conclusions

- Effects are anticipated to be:
 - Low magnitude—no loss of habitat and fish population
 - Local—limited to Project area
 - Long term for habitat availability—throughout construction and operation
 - Short term for habitat distribution—fish movement protected throughout life of the project
 - Not significant—residual effects not expected to alter local fish populations

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Wheeler River VC: Relationship to the Land

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Environmental Assessment Considerations

- Resources availability
- Land availability
- Suitability of land and resources

Potential Effects

- The presence of the project and its activities may result in changes to:
 - Water, vegetation, fish, and wildlife
 - Access to the area
 - Land area available
 - Noise level, traffic, dust, and other disturbances associated with Project activities
 - Quality of the experience using resources
 - Opportunities for Indigenous land use activities
 - Opportunities for non-Indigenous land use

Mitigation Measures

- Implementation of measures to protect plants, fish, and wildlife
- Limit the area of disturbance
- Use of noise reducing equipment
- Reduce dust and air emissions
- Enforce speed limits for traffic
- Implement radiological clearance of equipment before exiting Project site
- Implement progressive reclamation of disturbed areas
- Establish community agreements
- Establish trappers' compensation
- Implement Indigenous People's Policy, including ongoing communication with Indigenous Communities of Interest

Conclusions

- Effects are anticipated to be:
 - Low magnitude—no loss of habitat and fish population
 - Local—Project area (in and around the local and regional study area)
 - Long term—until reclamation is complete
 - Not significant—continuous in frequency, low in impact, and fully reversible following decommissioning

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Wheeler River VCs: Community, Culture and Economy

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Environmental Assessment Considerations

- Populations, traffic, community infrastructure and services
- Income, employment, training, government revenues, business opportunities
- Community cohesion and traditional economy
- Employment and training (generally delivered through institutions connected to northern Saskatchewan)

Potential Effects

- Activities that could interact with community, culture, and economy:
 - Population numbers and population characteristics
 - Up to 300 jobs created during construction and more than 100 direct and contract roles during the operation phase
 - Supervisory, trades, professional, technical, and foundational (entry level) positions available during operations
 - Availability and increased opportunities for business and training
 - Participation in traditional economic activities
 - Abscense of Traffic
 - Increased demand on community infrastructure and services

Mitigation Measures

- Implementation of agreements with communities (support)
- Prioritize Indigenous and non-Indigenous Communities of Interest (employment, training, and business, wherever possible)
- Implement procurement approach focused on local communities
- Implementation of education and other support services for workers and in some cases their families
- Planned pick-up points in alignment with employment practices
- Implementation of Emergency Response Plan

Conclusions

- Effects on community well-being, infrastructure, services and economy are currently being assessed, and are anticipated to be:
 - Minimal adverse and/or positive
 - Low to moderate magnitude—during construction and operation, and low during reclamation
 - Local—primarily in the Project area
 - Short to medium—based on Project phases
 - Not significant—continuous in frequency, moderate in context, and fully reversible following decommissioning

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Wheeler River Risk Assessment

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To evaluate and understand if people, plants, and animals will be exposed to substances at amounts above what is known to be safe after the planned mitigation measures have been applied.

It incorporates the movement of substances through the food chain as well as direct exposure to substances (soil, air, water, etc.) to appropriately capture risk.

Human Health Risk Assessment

- People who access the project site are considered in the risk assessment. They include:
 - Camp workers
 - Seasonal resident/edge operator—seasonal access
 - People fishing/hunting/trapping/gathering firewood/picking berries—traditional and recreational access
 - Neighbouring residents fishing/hunting/trapping
 - Future permanent residents—access to Project site after its decommissioning

Assessment Results and Mitigation

- Low overall health risk to people using the area
- Expected radiation doses to people below public dose limit
- Low risk of exposure of people to metals in the environment (below benchmarks for metals)
- Ongoing monitoring during all Project phases

Ecological Risk Assessment

Considers ecological receptors such as:

- Terrestrial Mammals—Woodland Caribou, hare, moose, black bear, lynx, etc.
- Riparian Mammals—Muskrat, mink
- Terrestrial Birds—Bald eagle, robin, Canada goose, etc.
- Riparian Birds—Mallard, loon
- Fish—Northern pike, white sucker
- Aquatic Invertebrates—Zooplankton, benthic invertebrates
- Terrestrial Vegetation—Lichen, Blueberry, Labrador tea
- Aquatic Vegetation—Phytoplankton, Macrophyte

These can be exposed to substances through direct exposure in water, sediment, soil, air or through the food chain.

Assessment Results and Mitigation

- Low overall health risk to animals, plants, and invertebrates
- Expected radiation doses to ecological receptors below benchmarks
- No risk of exposure to ecological receptors to non-radionuclides hazards
- Ongoing monitoring during all Project phases

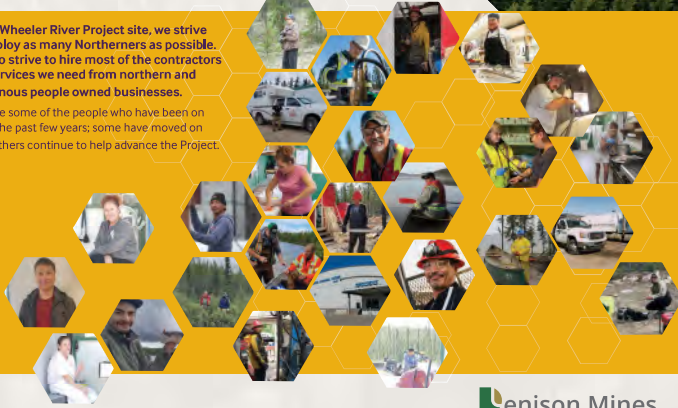
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Wheeler River Project People

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At the Wheeler River Project site, we strive to employ as many Northerners as possible. We also strive to hire most of the contractors and services we need from northern and Indigenous people owned businesses. Here are some of the people who have been on site in the past few years; some have moved on while others continue to help advance the Project.



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Wheeler River Building Relationships

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Denison and the Wheeler River Project team are committed to meaningful engagement with Indigenous people, communities, residents, and organizations with an interest in our Project.

TALKING together. LISTENING to you. RESPONDING to explain.

Engagement With Indigenous and Non-Indigenous Communities of Interest

- English River First Nation
- Kingsley Mills Local 30 (Ponchoal)
- Mills Nation - Saskatchewan
- A La Bale Mills Local 31 (Weila Cross)
- Spoone Mills Local 37 (Beauval)
- Patawaka Mills Local 82 (Patawaka)
- Northern Hamlet of Patawaka
- Northern Village of Pinehouse
- Northern Village of La La Croix
- Northern Village of Beauval

Other communities, organizations and groups of interest:

- Lac la Ponge Indian Band
- Brich Narrows Dene Nation
- Buffalo River Dene Nation
- Hatchet Lake First Nation
- Black Lake First Nation
- Ford du Lac First Nation
- Mills Nation - Saskatchewan
- Yat'yé Néné Land and Resource Office
- Prince Albert Grand Council
- Meadow Lake Tribal Council
- Commercial trappers
- Commercial loggers
- Cabin and lease owners

Thank You, Bobby John

Bobby John lived, trapped, fished and hunted in the Wheeler River Project area long before Denison and its predecessors started exploring the site. Over the years, Bobby John became someone our Project team relied on for insight on the area, for feedback on the Project proposal, for help with tracking wildlife and for assistance for our field teams, cutting through the bush and more. We will not forget Bobby John's contributions.

Since 2016 and every year after, Denison has met with community members and leadership through workshops, site tours, public meetings, and even virtual community meetings to hear concerns, receive knowledge and input, and share Project information. Subjects of workshops and meetings have included:

- Wheeler River Project components:
 - Access road
 - Treated water left/land discharge location
 - Mining method
 - Design change to freezing containment method
- Environmental considerations:
 - Water bodies - fishing
 - Fish habitat
 - Species at risk
 - Land disturbance

Our Support of Communities

Denison's support of communities can take various forms:

- Donations to community organizations
- Sponsorships of community events
- Sponsorships of in-kind support of education and field trips
- Direct agreements with specific Indigenous communities

Here are some examples of Denison's support in 2021:

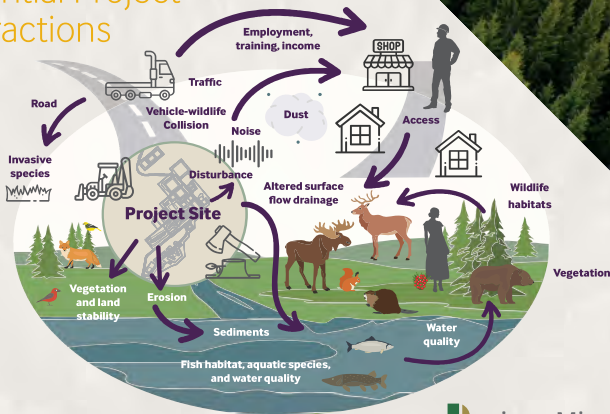
- Entered into an Exploration Agreement with English River First Nation
- Metty Nation Saskatchewan Region 3 South Day Gathering
- Stawacki Group and their market garden initiative
- Pinehouse Lake hockey tournament
- Improvements to the English River First Nation Culture Camp at the Meadow Lake Reserve at 160km
- Many Christmas initiatives in the region, including those in Beauval, La La Croix, and the Hamlet of Patawaka



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Wheeler River Potential Project Interactions

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Guidance Materials

To get you started

Environmental Assessments and Licensing can be complicated. This panel has information to help.

Environmental Assessment

- Any new mine will result in changes to the environment. The goal is to understand what those changes could be, and to reduce them as much as possible.
- This is done through an Environmental Assessment.

Mitigation

- Through the Environmental Assessment process, we learn what the effects could be.
- Removing those effects or making them as small as possible is done through Mitigation.
- Examples of mitigation measures include:
 - Recycling and reusing process water to reduce water intake and water discharge
 - Implementing speed limits to reduce vehicle collisions with wildlife.



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Significance

- Applying mitigation measures to planned mining activities reduces or removes effects leaving behind potential remaining effects. Determining how significant these potential remaining effects are is called Significance Determination.
- Significance is determined by:
 - How big the effects are = Magnitude
 - Where the effect occurs = Magnitude + Geographic Extent
 - When the effect occurs = Time
 - How often the effect occurs = Frequency
 - How long the effect lasts = Duration
 - Can the effect be undone = Reversibility
 - Are there any additional environmental or social considerations = Context
- After all of this is assessed, a determination is made about how significant a potential effect would be. Denison must ensure that our new mine will result in no significant adverse effects.

Monitoring

- An important part of the Environmental Assessment process is determining what kind of monitoring is required.
- The purpose of monitoring is to confirm that changes to the environment and land are the same as what was predicted.
- Common mining project monitoring examples include:
 - Surface water testing at new and old locations.
 - Testing and observing wildlife, fish and habitats.
 - Groundwater testing for mining method performance.

Commitments

- As one of the final steps of the Environmental Assessment process, Denison's commitments will be listed which include mitigation, monitoring, and other efforts.

Licensing & Permitting

- When the Environmental Assessment for a project is approved, it then moves on to a very important stage referred to as licensing and permitting.
- During this stage, the federal and provincial governments apply relevant legal requirements, standards, and guidelines to the project at a detailed level.
- Commitments may become legal requirements for the project, in addition to applicable requirements applied by the regulators.
- License types include:
 - Open License to Prepare Site, License to Construct, and License to Operate. Often these licenses are combined depending on what licensed activities a company aims to include.
 - Majority of Environmental Approval to Construct a Pollutant Control Facility and Approval to Operate a Pollutant Control Facility.
 - For Denison, the two key regulators are the Canadian Nuclear Safety Commission and the Province of Saskatchewan's Ministry of Environment.

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Land and Land Use Activities

Over the years, we have heard that this is important to you.

- What is the long-term impact to the land?
- I will consume the animals from my trapping, but there are fewer around than in the past.
- I fish in the area around Wheeler River.
- I might eat some berries while I am walking around.
- I am concerned about traditional land users and wildlife interruption.
- Will hunters and land users be restricted from accessing the area?
- Our ancestors have lived on our Traditional Territory since time immemorial.
- There are cultural sites and artifacts left throughout the region.

Environmental Assessment

We understand the importance of Land and Land Use in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Taking measures to protect plants, fish, and wildlife.
 - Treating water to regulatory standards to protect aquatic life.
 - Limiting the Project footprint and using areas that have already been cleared.
 - Reducing dust and air emissions and using noise reducing equipment.
 - Reclaiming disturbed areas on an ongoing basis.
 - Establishing Trappers' compensation and various agreements.
 - Assessing areas prior to construction for cultural sites and artifacts.

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Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Surface Water and Groundwater.**

Monitoring

- Main monitoring activities to be undertaken:
 - Wildlife populations studies
 - Bird surveys
 - Fish populations surveys
 - Vegetation sampling and testing

Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a single format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to land and land use will be contained within licenses and permits once received.

Denison will ensure requirements related to land and land use are met through implementation of programs, plans, procedures etc. Some examples include:

- Effluent and Emissions Monitoring Plan
- Groundwater Protection and Monitoring Plan
- Biodiversity Management Plan
- Waste Management Plan



Surface Water and Groundwater

Over the years, we have heard that this is important to you.

- All animals are affected by water quality.
- What happens with groundwater monitoring once the mining is done and the freeze wall comes out?
- Will you be treating the discharged water?
- I swim in many different lakes.
- Will the freeze wall affect groundwater?
- How will you protect the water quality?
- What happens when the freeze wall melts? Will there be monitoring of groundwater during this?
- Is there any chance of the wells blowing and contaminating the ground around it?

Environmental Assessment

We understand the importance of Surface Water and Groundwater in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Reducing freshwater intake and release to Whitefish Lake.
 - Water treatment in place before release of treated effluent.
 - Recycling contact water for use as process water.
 - Recycling process water for re-use.
 - Establishing a monitoring system for wells and pipelines.
 - Designing pipelines to have a second barrier to minimize spills to the environment.
 - Crossing the freeze wall before mining operations as a third level of containment to prevent mining solution from entering into surrounding groundwater.

Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Surface Water and Groundwater.**

Monitoring

- Main monitoring activities to be undertaken:
 - Water testing prior to release to the lake
 - Air testing
 - Groundwater sampling and testing

Commitments

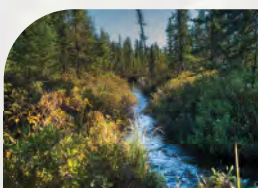
Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a single format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Province of Saskatchewan will regulate project activities through an Approval to Operate. Conditions related to surface water and groundwater stewardship will be contained within licenses once received.

Denison will ensure requirements related to surface water and groundwater are met through implementation of programs, plans, procedures, etc. Some examples include:

- Waste Management Plan
- Effluent and Emissions Monitoring Plan
- Groundwater Protection and Monitoring Plan
- Environmental Code of Practice



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Powering PEOPLE, PARTNERSHIPS AND PASSION.

Wildlife

Over the years, we have heard that this is important to you.

- Moose is what is in my freezer. Will the Project interrupt harvesting moose? Will I still be able to safely eat moose that I harvest?
- Will construction and operation harm moose and caribou populations?
- A lot of people live off that land, will the Project damage the animals?
- Would the chemicals being transported possibly harm wildlife?

Environmental Assessment

We understand the importance of Wildlife in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Limiting the Project footprint and using areas that have already been cleared.
 - Providing wildlife education and awareness training to staff.
 - Recording wildlife observations.
 - Ongoing reclamation of disturbed areas.
 - Surveying for habitat before clearing vegetation.
 - Working as quiet as possible, and avoiding clearing vegetation during denning and calving periods.
 - Putting up speed limit signs and wildlife crossing signs on Project roads.

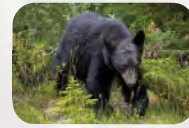
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Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Wildlife.**

Monitoring

- Main monitoring activities to be undertaken:
 - Wildlife populations studies and testing
 - Bird surveys and testing
 - Fish populations surveys and testing
 - Vegetation sampling and testing



Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a single format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to wildlife stewardship will be contained within licenses once received.

Denison will ensure requirements related to wildlife are met through implementation of programs, plans, procedures, etc. Some examples include:

- Environmental Monitoring Plan
- Biodiversity Management Plan
- Waste Management Program
- Facility and Equipment Management Program



Business and Work Opportunities

Over the years, we have heard that this is important to you.

- Seasonal workers need more opportunities. This will show us that you care.
- What are the economic opportunities? A new and smaller scale mining method can reduce jobs for the community. We need to learn about this kind of mining.
- What is your plan for training and for young people?
- For this new mining method, are there different types of jobs we should train for?
- We have been promised jobs in the past, but those promises were not kept. I'd like to see this change.
- Will you give site specific training, or training that is transferable?
- When the mine eventually closes a lot of people are going to lose jobs.
- What kind of employment opportunities will we see with Denison?

Environmental Assessment

We understand the importance of Business and Work Opportunities in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Prioritizing buying goods and services for the Project from local communities and communities in Northern Saskatchewan.
 - Prioritizing the hiring and training of local residents.
 - Establishing Trappers' compensation and various agreements.



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Significance

We have determined that there will be **No Significant Adverse Impacts on Business and Work Opportunities.** Local Northern Saskatchewan communities are expected to experience positive effects.

Monitoring

- Main monitoring activities to be undertaken:
 - Reporting on employment and business efforts

Commitments

Mitigation, monitoring, and other efforts are commitments that we have made. These will be outlined in a simple format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to business and work opportunities will be contained within licenses once received.

Denison will ensure requirements related to business and work opportunities are met through implementation of programs, plans, procedures, etc. Some examples include:

- Human Performance Program (Human Resource Development Plan)
- Training Management Program
- Surface Lease Agreement



Commitments

Commitments are related to mitigation, monitoring, and various other efforts. A comprehensive list of Denison's commitments will be provided to regulatory bodies, after which they can become part of licensing. Some examples of commitments are listed below.



- Develop a Draft Caribou Management Plan with the Ministry of Environment.
- Survey before disturbance to inform species-specific mitigation.
- Monitoring to ensure engineering designs are being met.
- Wellfield surface pipes will have secondary containment and a leak detection system.
- In ground mining solution and UBS will have three layers of protection.
- Liners (such as those used for the industrial wastewater treatment plant precipitate pond, hazardous waste storage pond, and effluent monitoring and release ponds) will be designed based on materials being stored. Performance monitoring will be in place.
- Above ground, double walled, fuel storage tanks.
- Adjusting and developing mitigation measures as needed, as part of an adaptive management process.
- Hazardous substances managed appropriately: Procedures for spill management, handling, and cleanup located in accessible location.
- Fresh water wells and surface water intake specifics developed according to best practice and applicable standards.
- Treated effluent discharge adhere to approvals and regulations to protect wildlife and water.
- Speed limits to reduce dust and protect wildlife.

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Wheeler River Project – Denison Mines

mâci masinahamihk okâwiymâw askiy mêskopicikêwin wihtamasinahkan kâ-wî-itôtamihk atoskêwin

anima Wheeler River atoskêwin(anima atoskêwin) anima Denison itascikêwin êkota situ miskêwin (ISR) kaskatêw asiniy wâtihkêwin êkwa osihcikêwin misi-wikamik:

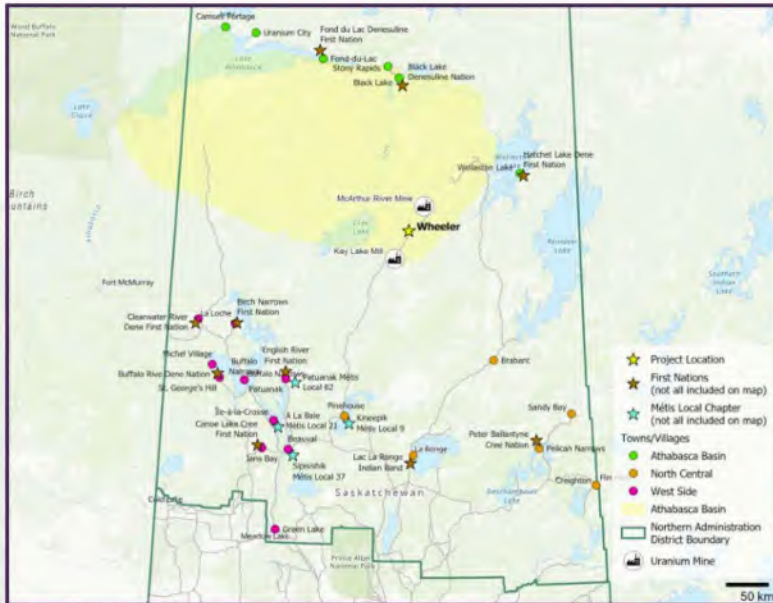
- tânitê: kîwîtinohk Saskatchewan, kanâta
- atoskêwin kîkwaya êkwa itôtamowina: anima tâwayihk atoskêwin kîkwaya anihi ISR wâtihkêwin êkwa anima osihcikêwin misi-wikamik. sihtoskamihk misi-atoskêwin kîkwaya êkwa itôtamôwina astêwa kîkwaya osci wêpinikêwina, nipiy pimipayicikana, wâskwatawêpicikana, êkwa pimitâpâsowin, tâskoc tôhêwina, sâkahikanisa, wikamikwa, mêskanawa, êkwa pimihâkan mêskanaw.
- pihcâyihk: kanâtahk nipiy, nanâtohk âpoya (osci wâtihkêwin, kaskatêw asiniy osihcikêwin, nipiy kanâcihcikêwin), wâskwatawêwin êkwa pimiy.
- wayawê itôtamowina: wêpinikêwin (askiwiya, kanâti asiniy wêpinikêwina, pîtosî wêpinikêwin asiniy (wâtihkêwin askiy), cîki wêpinikêwin, misi wêpinikêwin, sâpipêwina ohci osihcikêwin wikamik êkwa nipiy kanâcihcikêwin, mîsêw âpoy) îhîwina mîna pêwâpisk kaskâpahtêwina (GHGs) kisêwêwin, êkwa kanâcihtâhk nipiy kâ-sîkipitamihk nipîhk.
- kîkway osihtâhk: U3O8 ahpô osâwi-wîhkikasikan. anima kîkway Denison atâwâkêcik apacihcikâtêw isi pimiy êkota kaskatêwi asiniy wikamikohk, sihtoskamihk okâwiymâw askiy itôtamowin ka-nîkipitamihk GHG kaskâpahtêwina.
- atoskêwin: nântaw 300 atoskêwiyniwak kâ-osihcâtêw êkwa 180 ikospê atoskêwin. anima pimipayicikêwin ka-pihci-pimihâwak êkwa wayawê-pimihâwak atoskêwin.
- atoskêwin ispayik, 5 askiy osci pônihkamihk, êkwa 15 askiya osci kîsihtâhki-pônihkamihk ispayihowina.

anima okâwiymâw askiy kinwâpahcikêwin (EA) kâ-masinahikâtêk ôta okâwiymâw askiy mêskopicitamihk wihtamâkêwin (EIS) kinwâpahcikâtêw êkwa nanisihkâc, askôhamihk itôtamowin ka-kinwâpahtamihk atoskêwina tâskoc mêskocipayinwa. Kakwê osihtâhk kanawêyicikêwin EA masinahamihk, ahpô ayiwâk pihci, anima nistohtamowin misi-atoskêwin osihcikêwina. Tâskoc, anima tipêyaw nakatamowin osci osihcikêwak masinahikêwina nântaw 75 ha, mâka anima EIS itêhtamwak anima atoskêwin mêskocipayiwin cîki 170 ha. pêyakwan, tahto askiy osihcikêwin osci osihcikêwak osihtâwin anima 6 Mlbs U3O8 tahto askiy iskohk 10 askiya, mâka EIS itêhtamwak osihtâwin 9 Mlbs U3O8 tahto askiy isi 15 askiya, mîna mistahi itôtamowin iskohk 12 Mlbs U3O8 askiy osci itôtamowin waskawêwin. Itastêw, tâskoc, anima EIS kinwâpahtamwak pihcâyihk nitawêhtamihk êkwa wayawêwina osihtâhk tahtwâ askiy 50% ayiwâk kâ-itêhtamihk.

kîkwaya kâ-astêki kâ-kîsi kanâcihtâhk ikospê pihcaw osci askiy ê-kîskatahikâtêk, ayiwâk ayisîniwak ê-pimitâpâsocik, kaskâpahtêw, wêpinikêwina, êkwa nipiy pimipayicikêwin. Kîkway kâ-ispayiki kinwâpahcikâtêwa êkwa itasiwâtamihk anihi EIS anima atoskêwin kâ-kî-osihcikâtêw, pimipayicikâtêw, êkwa pônî-apacihcikâtêw ikospê misi-wikamikwa êta kâ-wîkîcik miywâsinwa êkwa ahkami apacihcikâtêwa, kinosêwak êkwa pisiskiwak miywâyâwak, ayisîniw miywâyâwin kanawêyicikâtêw, astêwa kîkway ka-apacihcâtêw askiy, tâskoc iyiniw pakitinikowisowina, êkwa ahakami kiyohkêwin êkwa sônîyahkêwin. Anima EIS itasinahikâtêw kwayisk itôtamowina, kinwâpahcikêwina, êkwa asotamâkêwina osci Denison ka-ayâcik sohkêyimowin anima atoskêwin ê-pimipayik êkwa ispayihowin osci atoskêwin osihtâwin, pimipayicikêwin, pônî-apacihcikâtêk astêwa êkota ahpô apisîs itêhtamowina ispayihowina.

misawê, ôma atoskêwin itêhtâkwan kwayisk ta-ispayik askîhk pihci kotakwa wâtihkêwina. pihcaw osci, anima ISR wâtihkêwin itôtamowin, anima atoskêwin astêwa namôya mistahi kîkway ê-nakacikâtêki kâ-kîsi-kanâcihtâhk pihci kotakwa wâtihkêwina ahpô atâmihk askîhk wâtihkêwina êkwa kotakwa itôtamowina.

mistêhtâkwan, Denison pâ-pîkiskwâtêwak iyiniwak êkwa kotakwa atoskêwikamikwa, ayisîniwak, êkwa kanawêyicikêwak ikospê 2016. Mâmawi itôtamowin isi pîkiskwêwin êkwa yahtohtahikêwin osci anima atoskêwin wihtamwak ôki ayisîniwak ka-miyo-ispayiki atoskêwina êkwa anihi EA nanâtohk êsi. Denison wâpahtamwak anima EIS tâskoc mistêhtâkwahk wiycikêwin kîkway ka-sihtoskamihk nîkânihk itôtamowina êkwa pîkiskwêstamwak pêyak itôtamowin êkota kâ-ayimahk EA, masinahikêwin, êkwa pakitinamihk kaskatêwi asiniy wâtihkêwin wikamik êkota kanâta.



tântê

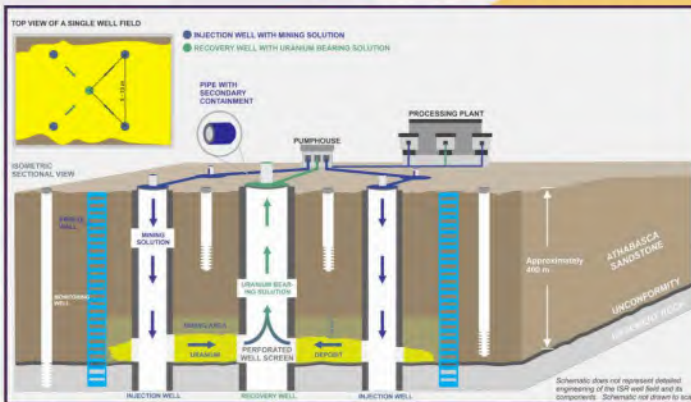
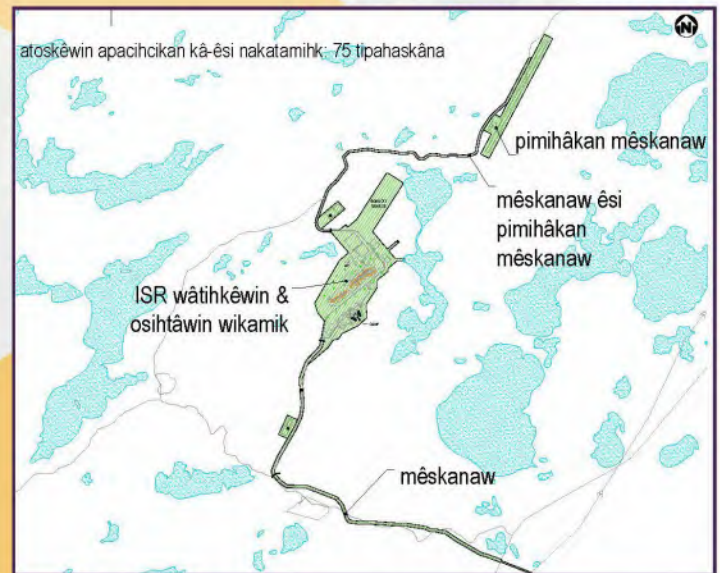
anima Wheeler River atoskêwin
astêw êkotî kiwîtinohk
Saskatchewan êkota Athabasca
kapâwin.

atoskêwin kâ-êsi nakatamihk

animi kihci atoskêwin
apacihcikana astêwa êkota situ
kâwi-miskamihk wâtihkêwin
êkwa osihtâwin wikamik.

êkota SITU kâwi-miskamihk

êkota situ kâwi-miskamihk apacihcikâtêw kisitêk
âpoy ka-otinamihk kaskatêwi asiniya osci askîhk
isi cîstamihk êkwa kâwi mônahipâna. Anima
osihtâwin wikamik astêwa maskimota êkwa
apacihcikana ka-otinamihk kaskatêwi asiniy osci
situ kâwi-miskamihk isi osâwi wihkihasikan.
Denison ka-atâwâkêwak anima osâwi
wihkihasikan ka-apacihtâhk ka-sipwêpitamihk
wâskwatawêwikamikwa, sihtoskâtahkik
okâwiymâw askiy itôtamowina ka-nîkipitamihk
pihcupowi kaskâpahtêwina.



mistakihtêki apacihcikana & atoskêwina waskawêwina

Denison kinwâpahtwak kîkwaya,
isihkâtêki mistakihtêki ispayihowina osci
anima atoskêwin êyikoni kîkwaya.



Wheeler River Project – Denison Mines

Ēłóchëlë Nih Bazi t'áú nih besoídi ha si erit'is.

T'aghá Holnį si diri nih bazi nuhhel kodi hasj.

Diri Wheeler River – Denison Mines nih sēnolye ha si, t'au nih nághįna ha (situ) Yanathē tthe ghą nade ha si.

- Yathé nene diri Saskatchewan k'eyaghē hoʔą si Canada tth'i k'eyaghē.
- Diri t'au tu t'arat'į si senalye ha, t'a ghą nade si konųhełnį ha. Kon/tthe slįnį (Uranium) senalye seráde ha, tulu k'e ts'etai sēlye, yoh tth'i ts'etai sohúde ha. Beyets'et'ali neltła ha tth'i senuhut'a ha. T'aʔu tu t'arat'į si (tu slįnį) sohulye ha. Diri t'aʔu nih t'arat'į si senalye ha hodi sj.
- 'Senahulye de, tu nezų, tthe slįnį t'aʔu senalye ha. Kon bēt'á asi hēt'ēl si, t'ēs tth'i ts'etai sēlye si."
- Ku diri halye ha si, t'áchaghē, tthe t'a bohełtaile si, t'aʔu nih dałdhe nįsi, tu, tujērē-ú, tsą tue-ú, t'aʔu tthe t'arat'į si tu hēl si, sēlye ha. Ku diri asi ghą nade t'a horehth'a si ya bazį tth'u. T'a tu senalye si eyi tth'i hahodi.
- Diri tthe slįnį (uranium) łes ʔahot'į alye si bēt'á kon hołe, kon heltsi ha. Diri kon uranium t'a holį de, dēhth'agh hile snį.
- Diri nih Senahulye si bónįther de tononą (300) ts'etai sohulye ha si. Łononą- įłk'etoną tth'i Dene ēghádálana ha sj. Diri bónįther de beyets'et'ali t'arat'į ha.
- Diri t'a bēghą Eghalada ha si tóną-įłk'edįghį nene-ú, nake nene ts'etai sohúde ha-ú, sųlaghe nene t'a nuhųt'ą si nanelye ha, Sųlaghe ts'adhel nene ts'etai senahulye ha.

Diri nih senahulye si horelyų net'į, nih-ú, ya-u t'áú besuwidi ha.

T'aʔu nih ts'etai sēlye ha si, t'a Dene yēghą erit'is dałtsi hotié deʔą (engineering), erit'is nédhé bets'į deʔą, t'aʔu nih hotié ts'etai ʔalye ha.

Diri t'aʔu aresį henį, nih nechozē ʔańį sj, įlaisdįghį nih hultsai anįtttha u, kuli horįchoze ʔats'edi sj, T'a ha seráde si tthe slįnį (uranium) halye ha hodi sj łonēną nene ha hodi. Ku diri t'a the slįnį halye hasi, sųlaghe ts'adhel nene tthe nezų halye ha henį. T'át'u tthe įłk'etaghē limil (łonēną ąnelt'e) ʔaįđdath henį, kuli lota limil tthe hilchu has henį. Kuli sųlaghe ts'ēdel nene anįtttha de nake ts'adhel limil ʔaįđdath the hilchu hasi. Eyi t'a solóną (percent) hoʔąnelt'e tthe hilchu ha henį sj.

Diri bēt'á Eghalada si t'au nih ts'etai sēlye si, bēhchēnē tth'i la ha-ú, horetth'a t'au, asiʔaldel tth'i ła-ú, tu t'a bēt'á Eghalada si besorįthēn ha la. ʔątu nih, tu-ú, ya ts'en boʔēłta hasą. Kuli yedołnį ha henį.

Diri bēghą Eghalada si, yēghą ēghadálghēna hoyaghē ts'etai sedáhúlye-ú, łue-ú, nųneshe, ēch'ērē, hotié besoídi ha, Dene t'a dąghēna. Denesųłine nih t'a dąghēna la, nuhhenene theri hoʔą. Nih-u, tu-ú, ya-ú nuųha besudi hoʔą.

Diri t'aʔu nih ghą ēghádálana si hotié bahodi, t'aʔu erit'is holį si hotié déʔą, t'aʔu ts'etai sohúde-ú, t'aʔu ēghádálana-u, t'aʔu nih senalye si hotié déʔą.

Diri t'aghą ēghádálana si hotié nih hodi ha henį, yanįzi t'aʔu nih hesdohołts'į si konalyehaile dųų henį. T'a tthe nih-u, tu-u, ya-u bēt'á nezųle ni, dųų tthe slįnį si bēt'á nih-u, tu-u, ya-u hesedowełnį ha henį. T'a tthe nih horįcha nailts'el nį, nih yaghē tth'i dēgharē nih nárałts'ul nį – dųų kone haile henį.

Dųų de t'a benenē k'e ēghadálghēna si bedóghelįnį déʔą, hotié t'a ghą ēghadalaida si bełkoridi hoʔą 2016 hots'į. Diri t'a bēghą náide si t'a benenē si beł hoʔą. Nih hodi hoʔą, tu-u, ya-u boghedi ha. Diri t'a erit'is beł'azi (license) si, horelyų sohúde déʔą, diri Canada k'eyaghē tthe slįnį ghą naidi hade.



LOCATION

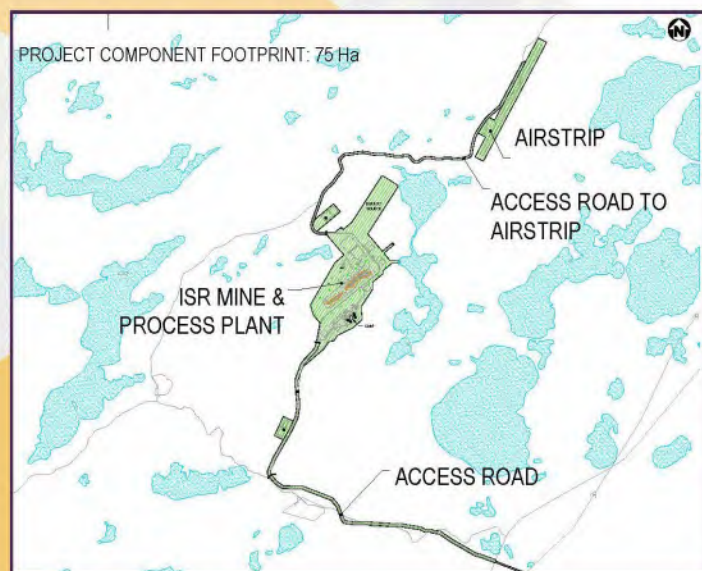
Ku diri k'eyaghë deht'is si t'a ts'en ëghadálghëna hasi horet'ì – Dene nenene k'e.

PROJECT FOOTPRINT

Diri t'a yet'a nih ghà nade has si deht'is sj.

IN SITU RECOVERY

Diri tu het'el t'a tthe slìnjì hilchu, horìcha horet'ì la, t'at'u tthe sëralye si bët'a les hoë. Ku eyer hots'ì les bëghà nánì, horelyu nene k'e, t'a horehth'a ch'a hodołni sj. Eyi ʔarałnjì Greenhouse Emissions, diri nih k'e náide si besoıdı ha.



VALUED COMPONENTS & PROJECT INTERACTIONS

T'aʔu nih besoıdı hasi Dene yek'odarëlyä hasa.



Wheeler River Project – Denison Mines

Draft Environmental Impact Statement

Project Overview

The Wheeler River Project (the Project) is Denison's proposed in situ recovery (ISR) uranium mine and processing plant:

- Location: northern Saskatchewan, Canada.
- Project components and activities: the central Project components are the ISR mine and the processing plant. Supporting Project components and activities include those needed for waste management, water management, distribution of electricity, and transportation, such as pads, ponds, buildings, roads, and an airstrip.
- Inputs: freshwater, chemicals (for mining, uranium processing, treating water), electricity, and fuel.
- Outputs: waste (organics, clean waste rock, special waste rock (drilling core), domestic waste, industrial waste, precipitates from the processing plant and water treatment, sewage), air emissions including greenhouse gas emissions (GHGs), noise, and treated effluent.
- Product: U_3O_8 or yellowcake. The product Denison sells is ultimately used as fuel in nuclear power plants, supporting global efforts to reduce GHG emissions.
- Employment: Approximately 300 workers during Construction and 180 during Operation. The Project will be operated as a fly-in-fly-out operation.
- Project duration: Total of approximately 38 years, about 2 years for Construction, 15 years for Operation, 5 years for Decommissioning, and 15 years for Post-Decommissioning periods.

The environmental assessment (EA) outlined in this environmental impact statement (EIS) was transparent and conservative, following a standard, step-wise approach for evaluating Project effects including cumulative effects. In an effort to generate a conservative EA and provide operational flexibility, Denison developed an assessment basis for the EA which bound, or was higher than, the current understanding of the Project's engineering design basis. For example, the direct Project footprint based on engineering site plans is about 75 ha, but the EIS assumed the Project's area of disturbance was closer to 170 ha. Similarly, the annual production for current engineering design is 6 Mlbs U_3O_8 per year over 10 years, but the EIS assumed production of 9 Mlbs U_3O_8 per year over 15 years, with a peak production up to 12 Mlbs U_3O_8 in a given year to allow for operational flexibility. This means that, for example, the EIS assessed inputs needed and outputs generated on an annual basis as being 50% more than expected.

Residual effects remaining after mitigation were largely linked to land clearing, increases in traffic, emissions to air, waste generation, and water management. Residual effects were evaluated for 32 Valued Components (VCs) and significance determined for receptor VCs. The evaluations and conclusions of the EIS are that the Project can be constructed, operated, and decommissioned while regional plant communities are stable and continue to function, regional fish and wildlife populations are viable and healthy, human health is protected, there is continued opportunity for land use activities, including exercising Indigenous rights, and there is continued social and economic viability of local economies. The EIS outlines mitigation measures, monitoring requirements, and commitments needed for Denison to have confidence that Project is operating as planned and that the actual effects resulting from Project Construction, Operation, and Decommissioning are at or below predicted effects.

Overall, the Project has the potential to achieve a superior standard of environmental sustainability when compared to conventional uranium mining operations. Owing, in large part, to the use of the ISR mining method, the Project has potentially fewer residual effects remaining after mitigation when compared to conventional open pit or underground mining methods and conventional milling activities.

Importantly, Denison has been proactively engaging with Indigenous communities and organizations, the general public, and regulatory agencies since 2016. The use of a collaborative approach to engagement and advancement of the Project is exemplified by the input these groups have provided to influence both project designs and the EA in various ways. Denison views the EIS as an important planning tool that will be used to support future activities and represents one stage in the rigorous EA, licensing, and permitting process for a uranium mining facility in Canada.

LOCATION

The Wheeler River Project is located in northern Saskatchewan in the Athabasca Basin.

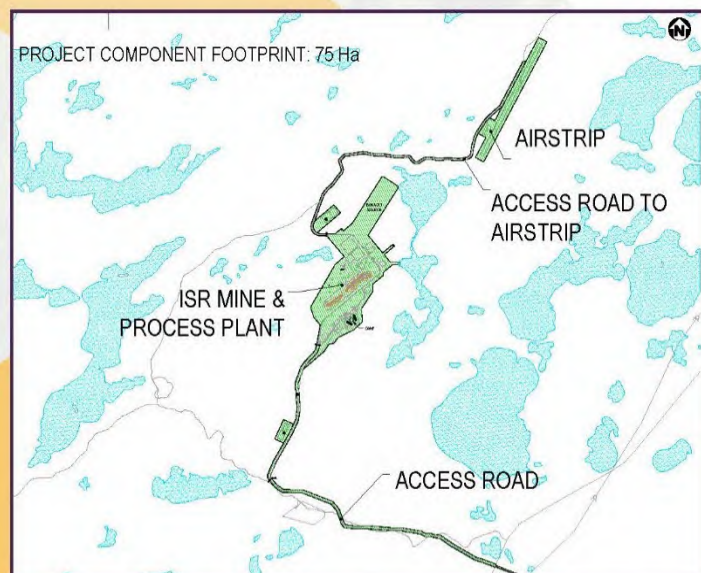


PROJECT FOOTPRINT

The main Project components are the in situ recovery mine and the processing plant.

IN SITU RECOVERY

In situ recovery uses an acidic solution to leach uranium ores from the ground through a series of injection and recovery wells. The processing plant houses the tanks and equipment to process the uranium recovered from in situ recovery into yellowcake. Denison will sell the yellowcake to the market for use in nuclear power plants, supporting global efforts to reduce greenhouse gas emissions.



VALUED COMPONENTS & PROJECT INTERACTIONS

Denison is assessing elements, called valued components, important to people or the environment, and the potential effects of the Project on these elements.



Open House

**Village of Pinehouse Lake
Pinehouse Village Hall**

Oct 24, 2023

5:00pm to 8:00pm

Wheeler River Project

Come to meet with Denison staff, to discuss the Project, to share a meal, and to get a chance to win great door prizes.



Information



Community Supper



Door Prizes

 **Denison Mines**

Open House

Village of Pinehouse Lake
Pinehouse Village Hall

Oct 24, 2023
5:00pm to 8:00pm

Powering
**PEOPLE, PARTNERSHIPS
AND PASSION**

Wheeler River Project

Come to meet with
Denison staff, to discuss
the Project, to share a
meal, and to get a chance
to win great door prizes.



Information



Community Supper



Door Prizes

 **Denison Mines**

Denison Mines – Land User Meeting
Pinehouse Lake
October 24, 2023 – 1pm to 3pm, Village Hall

Denison Mines

- Stephanie Lukowski
- Janna Switzer
- Chad Sorba
- Carolanne Inglis-McQuay
- CNSC and Province in Attendance

20 KML Members in attendance.

Welcome and introductions: Walter Smith

Opening prayer

Translator: Vince spoke in Cree- explained purpose of the presentations.

KML: How many freeze walls holes? How many holes need to be drilled? Recovery holes? Is that a large portion of the capital?

KML (Vince): When we're dealing with uranium and radiation is involved – what does your modeling look like when radiation hits the mine site.

DEN: CNSC has limits – Cameco has their internal maximum ml per year. Internal mechanisms for radiation exposures for Denison. Exposure in the environmental procedures.

KML: When talking about wheeler river – he spent many years commercial fishing in Wheeler with his little work camp.

KML: Social economic benefits – the fact you are politically, we want some kind of insurance that you look at the whole community and any kind of funds – the whole community needs to be involved not only a few people.

KML: Work concern – being forced right in the corner as private contractors, if I have 100s of employers in the past he is down to nothing cause the community forced him to step down from politics. He asks in fairness – in any conditions or licenses that everyone gets an equal amount out of all this. The thing is, yes people care about the environment and the future of the children. The negotiating you are doing with the politicians, are not always going to be there. If you want to make a footprint for northern Saskatchewan, leave it for our future children. Asking the mines and CNSC to be evenly distributed to the whole community. He has always supported the mining industry.

CNSC Presentation/Overview

- Who they are, what they do and what they do not do:
- Independent Commission
- Environmental Protection Framework

- Purpose of environmental assessments
- Indigenous Engagement and Consultation

KML: He thought how this work, how we should be given economic opportunities – how we should be given first opportunities and it never really did work out.

KML: DTC – is that part of CNSC departments? Yes, it is.

KML: When DTC comes to Pinehouse, we ask questions, and we never really get answers and we do not understand when we are left out and not have our questions answered. It was not properly exercise – not just read out from the paper, because we can do that ourselves. Stating that DTC feels like it is not being worth it.

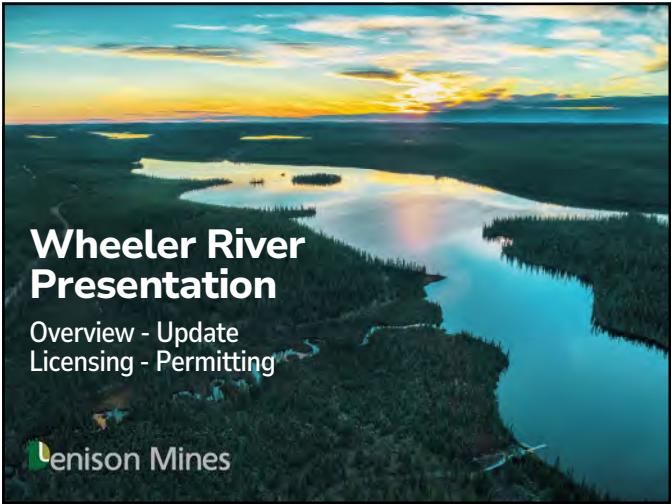
Walter – regarding DTC - it is a Growing process, not too long ago we did not have a voice. Like 2 or 3 years ago they started hearing us. What has changed in the last 3 years – we are not being consulted. Negotiations now to industry, it has brought a bigger impact to our community in a good way.

Gov't of Sask Presentation/Overview

- Environmental assessments
- DTC
- With any project it is a long process, and they need to make it beneficial enough to release that project.

KML: It is hard to get in contact with anyone in the Government environment department.

Closing remarks – Walter



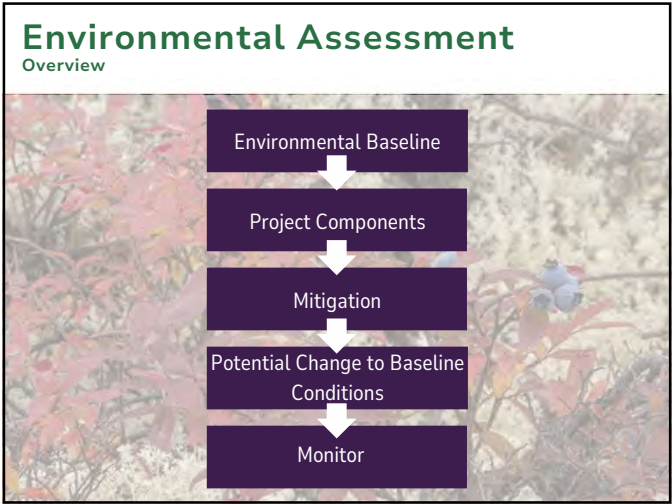
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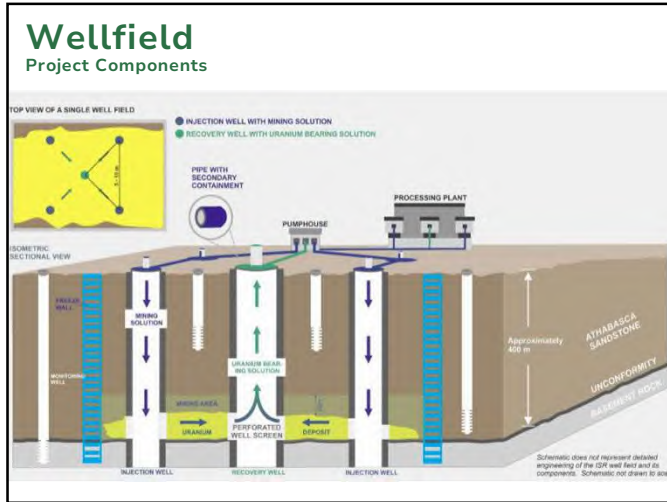
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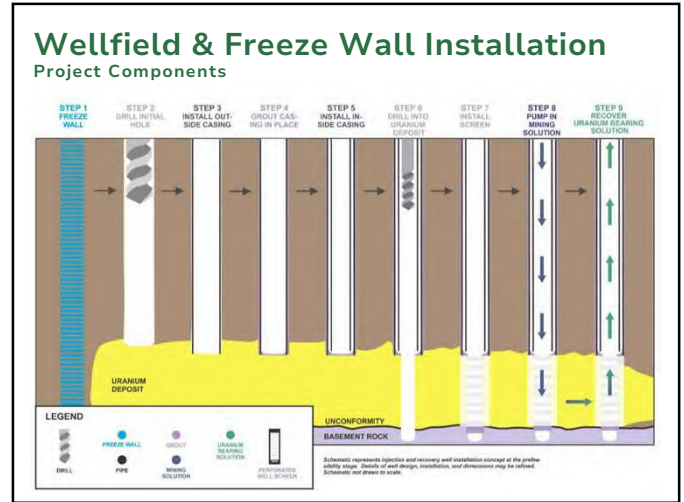
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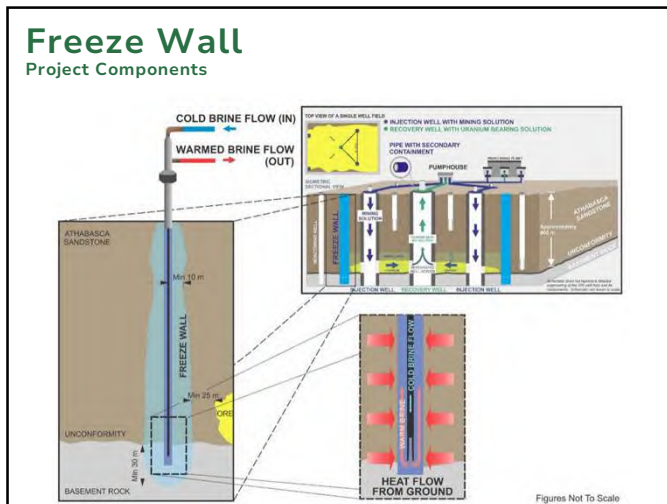
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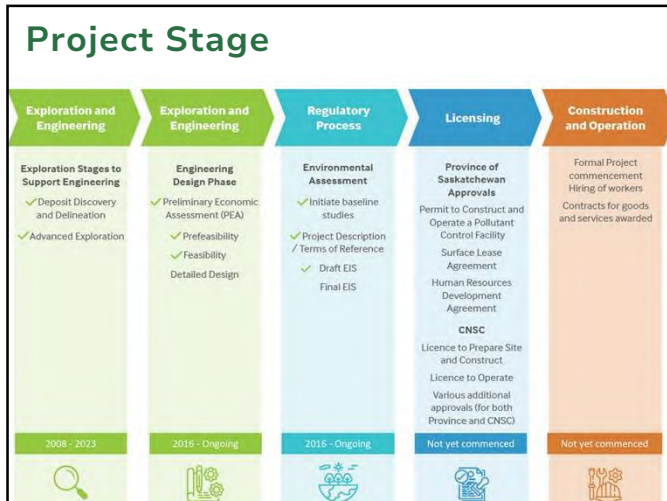
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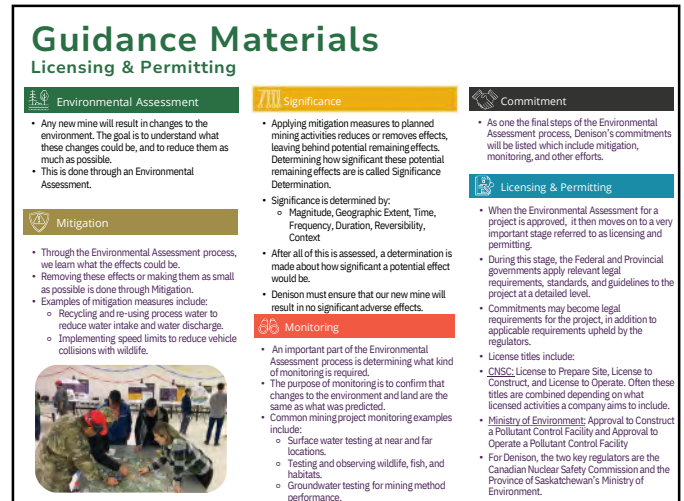
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8



9



10

Over the years, we have heard that this is important to you.

"What is the long-term impact to the land?"

"I will consume the animals from my trapline, but there are fewer around than in the past."

"I fish in the area around Wheeler River."

"I might eat some berries while I am walking around."

"I am concerned about traditional land users and wildlife interruption."

"Will hunters and land users be restricted from accessing the area?"

"Our ancestors have lived on our Traditional Territory since time immemorial."

"There are cultural sites and artifacts left throughout the region."

Land & Land Use Activities

11

Land & Land Use Activities

Licensing & Permitting

Environmental Assessment

We understand the importance of Land and Land Use in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Land and Land Use.**

Licensing & Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to land and land use will be contained within licenses and permits once received.

Denison will ensure requirements related to land and land use are met through implementation of programs, plans, procedures etc. Some examples include:

- Effluent and Emissions Monitoring Plan
- Groundwater Protection and Monitoring Plan
- Biodiversity Management Plan
- Waste Management Plan

Mitigation

Some key mitigation measures to manage and control the potential effects before and during operations include:

- Taking measures to protect plants, fish, and wildlife.
- Treating water to regulatory standards to protect aquatic life.
- Limiting the Project footprint and using areas that have already been cleared.
- Reducing dust and air emissions and using noise reducing equipment.
- Reclaiming disturbed areas on an ongoing basis.
- Establishing Trappers' compensation and various agreements.
- Assessing areas prior to construction for cultural sites and artifacts.

Monitoring

Main monitoring activities to be undertaken:

- Wildlife populations studies
- Bird surveys
- Fish populations surveys
- Vegetation sampling and testing

Commitment

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a simple format for the regulators. Commitments then can become part of licensing.

12

Over the years, we have heard that this is important to you.

"All animals are affected by water quality."

"What happens with groundwater monitoring once the mining is done, and the freeze wall comes out?"

"Will you be treating the discharged water?"

"I swim in many different lakes."

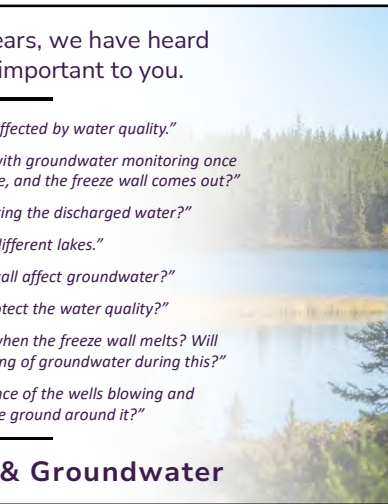
"Will the freeze wall affect groundwater?"

"How will you protect the water quality?"

"What happens when the freeze wall melts? Will there be monitoring of groundwater during this?"

"Is there any chance of the wells blowing and contaminating the ground around it?"


Surface & Groundwater



13


Surface & Groundwater

Licensing & Permitting




Environmental Assessment

We understand the importance of Surface Water and Groundwater in Northern Saskatchewan; it's one of the reasons we completed an Environment Assessment on the potential effects.



Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Surface Water and Groundwater**.




Licensing & Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to surface and groundwater will be contained within licenses and permits once received.

Denison will ensure requirements related to surface water and groundwater are met through implementation of programs, plans, procedures etc. Some examples include:


- Waste Management Plan
- Effluent and Emissions Monitoring Plan
- Groundwater Protection and Monitoring Plan
- Environmental Code of Practice



Mitigation

Some key mitigation measures to manage and control the potential effects before and during operations include:


- Reducing freshwater intake and release to Whitefish Lake.
- Water treatment in place before release of treated effluent.
- Recycling contact water for use as process water.
- Establishing a monitoring system for wells and pipelines.
- Designing pipelines to have a second barrier to minimize spills to the environment.
- Creating the freeze wall before mining operations as a third level of containment to prevent mining solution from entering into surrounding groundwater.



Monitoring

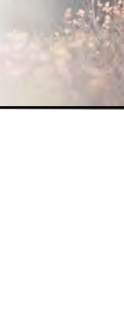
Main monitoring activities to be undertaken:

- Water testing prior to release to the lake.
- Air testing.
- Ground sampling and testing.



Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a simple format for the regulators. Commitments then can become part of licensing.



14

Over the years, we have heard that this is important to you.

"Moose is what is in my freezer. Will the Project interrupt harvesting moose? Will I still be able to safely eat moose that I harvest?"

"Will construction and operation harm moose and caribou populations?"

"A lot of people live off the land; will the Project damage the animals?"

"Would the chemicals being transported possibly harm wildlife?"


Wildlife



15


Wildlife

Licensing & Permitting




Environmental Assessment

We understand the importance of wildlife in Northern Saskatchewan; it's one of the reasons we completed an Environment Assessment on the potential effects.



Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Wildlife**.




Licensing & Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to wildlife stewardship will be contained within licenses once received.

Denison will ensure requirements related to wildlife are met through implementation of programs, plans, procedures etc. Some examples include:


- Environment Monitoring Plan
- Biodiversity Management Plan
- Waste Management Program
- Facility and Equipment Management Program



Mitigation

Some key mitigation measures to manage and control the potential effects before and during operations include:


- Limiting the Project footprint and using areas that have already been cleared.
- Providing wildlife education and awareness training to staff.
- Recording wildlife observations.
- Ongoing reclamation of disturbed areas.
- Surveying for habitat before clearing vegetation.
- Working as quiet as possible, and avoiding clearing vegetation, during denning and calving periods.
- Putting up speed limit signs and wildlife crossing signs on Project roads.



Monitoring


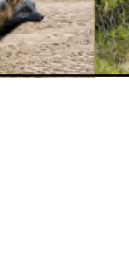
Main monitoring activities to be undertaken:

- Wildlife population studies and testing
- Bird surveys and testing
- Fish population surveys and testing
- Vegetation sampling and testing



Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a simple format for the regulators. Commitments then can become part of licensing.

16

Over the years, we have heard that this is important to you.

"Seasonal workers need more opportunities. This will show us that you care."

"What are the economic opportunities? A new and smaller scale mining method can reduce jobs for the community. We need to learn about this kind of mining."

"What is your plan for training and for young people?"

"For this new mining method, are there different types of jobs we should train for?"

"We have been promised jobs in the past, but those promises were not kept. I'd like to see this change."

"Will you give site specific training, or training that is transferable?"

"When the mine eventually closes a lot of people are going to lose jobs."

"What kind of employment opportunities will we see with Denison?"

Business & Work Opportunities

17

Business & Work Opportunities

Licensing & Permitting

Environmental Assessment

We understand the importance of Business and Work Opportunities in Northern Saskatchewan; it's one of the reasons we completed an Environment Assessment on the potential effects.

Mitigation

Some key mitigation measures to manage and control the potential effects before and during operations include:

- Prioritizing buying goods and services for the Project from local communities and communities in Northern Saskatchewan.
- Prioritizing the hiring and training of local residents.
- Establishing Trappers' compensation and various agreements.



Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Business and Work Opportunities**. Local Northern Saskatchewan communities are expected to experience positive effects.

Monitoring

Main monitoring activities to be undertaken:

- **Reporting on employment and business efforts.**

Commitment

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a simple format for the regulators. Commitments then can become part of licensing.

Licensing & Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to business and work opportunities will be contained within licenses once received.

Denison will ensure requirements related to business and work opportunities are met through implementation of programs, plans, procedures etc. Some examples include:

- Human Performance Program (Human Resource Development Plan)
- Training Management Program
- Surface Lease Agreement



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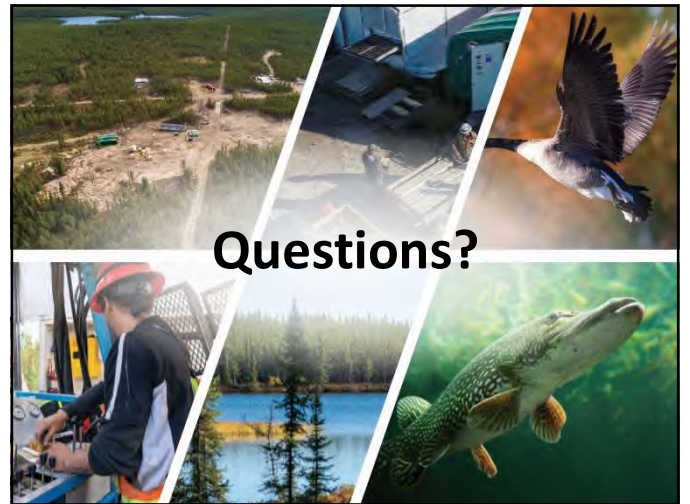
Licensing and Permitting

Commitments



- Develop a Draft Caribou Management Plan with the Ministry of Environment.
- Survey before disturbance to inform species specific mitigation.
- Monitoring to ensure engineering designs are being met.
- Wellfield surface pipes will have secondary containment and a leak detection system.
- In ground mining solution and UBS will have three layers of protection.
- Liners (such as those used for the industrial wastewater treatment plant precipitate pond, hazardous waste storage pad, and effluent monitoring and release ponds) will be designed based on materials being stored. Performance monitoring will be in place.
- Above ground, double walled, fuel storage tanks.
- Adjusting and developing mitigation measures as needed, as part of an adaptive management process.
- Hazardous substances managed appropriately. Procedures for spill management, handling, and cleanup located in accessible location.
- Fresh water wells and surface water intake specifics developed according to best practice and applicable standards.
- Treated effluent discharge adhere to approvals and regulations to protect wildlife and water.
- Speed limits to reduce dust and protect wildlife.

19



Questions?

20

Wheeler River VCs: Ground, Terrain and Soil

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Environmental Assessment Considerations

- Land stability
- Soil quantity, quality and nutrients

Potential Effects

- Activities that could impact land stability, surface drainage patterns, surface erosion potential, soil quality, and soil quantity:
 - Clearing, grading, and construction
 - Unexpected spills, leaks
 - Release of water to groundwater and/or surface water bodies

Reclamation of disturbed areas may result in similar Project-related effects, but to a lesser extent.

Mitigation Measures

- Limit the area of disturbance
- Construction strategies to eliminate or reduce impacts
- Use of existing clearings and previously disturbed land
- Reusing disturbed sources of soil nutrients, generated during construction, for the reclamation process
- Installation of sediment/erosion controls and surface water management features
- Monitoring of open-source dust associated with major earthworks and equipment travel
- Fuel Management and Spill Control Plan in place to respond to unexpected leaks, spills, and releases of materials
- Wherever possible, progressive reclamation will be conducted throughout the life of the Project in relation to landscape features (slope, aspect) and surface drainage patterns

Conclusions

Effects are anticipated to be:

- Low magnitude—within range of natural variations
- Local—limited to areas disturbed by the project
- Medium term—up to, but not including post-decommissioning
- Not significant—residual effects are not expected to alter VCs integrity and sustainability nor their availability to contribute to the environment

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Wheeler River VCs: Wildlife and Birds

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Environmental Assessment Considerations

- Populations and health of wildlife including:
 - Ungulates: Moose, Woodland Caribou
 - Furbearers: Wolverine, Mink, Muskrat
 - Birds: Bald Eagle, Osprey, Common Nighthawk, Short-Eared Owl, Watershrike, Game Birds, Songbirds, Yellow Rail, Rusty Blackbird, Olive-Sided Flycatcher

Potential Effects

- Activities that could reduce or disturb species of wildlife, birds, or habitats include:
 - Vehicles, equipment, and aircraft traffic
 - Dust
 - Human presence
 - Collisions with equipment and vehicles
 - Entrapment in facilities
 - Exposure to substances in dust
 - Release of Project-related treated effluent
 - Spills of hazardous materials
 - More efficient hunter, trapper, and predator access to the Project area via new access routes
- Changes to surface water quality could affect wildlife habitat and health from water management practices.
- Decommissioning of Project site may result in a continued alteration of wildlife habitat and/or mortality from vehicle-wildlife collisions.

Mitigation Measures – Wildlife Management Plan

- Limit the area of disturbance
- Use of existing clearings and previously disturbed land
- Site clearing scheduled to avoid times when animal and birds are denning, raising, breeding
- Nesting surveys conducted before clearing to identify and establish measures to protect dens, burrows, lodges, nests, and other habitat
- Measure and practices to reduce the generation of dust
- Secondary containment of tanks and pipelines to contain accidental leaks and spills
- Implementation of Fuel Management and Spill Control Plan
- Fencing and monitoring contaminated areas—waste ponds and pools, landfill
- Implementation of Woodland Caribou Management Plan
- Employees trained to minimize their impact on wildlife, such as no littering, respect for wildlife, etc.
- Implementation of speed limits to reduce risk of collisions with wildlife
- Waste and hazardous materials collected and temporarily stored in wildlife-proof containers

Conclusions

- Effects are anticipated to be:
 - Low magnitude—risk of mortality within range of natural variations
 - Regional effect on habitat loss—limited to Project area
 - Local effect on mortality—direct mortality within Project area from vehicle-wildlife collisions, but indirect mortality could extend beyond Project area
 - Medium term for long-term—highest loss of habitat and mortality vehicle-wildlife collisions expected during construction and operation, but may continue during other phases of the project
 - Medium to long term for furbearers, raptors and at-risk bird species—loss of habitat and mortality vehicle-wildlife collisions expected during all phases of the project
 - Long term for woodland caribou and migratory breeding birds—alteration of habitat and mortality vehicle-wildlife collisions expected during all phases of project—highest mortality potential during construction and operation
 - Not significant—residual effects not expected to alter habitat integrity nor wildlife and bird regional populations sustainability

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Wheeler River VC: Aquatic Environment

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Environmental Assessment Considerations

- Fish habitat availability and distribution
- Fish survival and reproduction
- Surface water levels and flow
- Concentration of chemicals and metals in surface water
- Concentration of chemical and metals in aquatic sediments
- Distribution and survival of snails, worms, dragonfly larvae, and other benthic invertebrates

Potential Effects

- Activities that could reduce or disturb aquatic environments, species, or habitats:
 - Modification of fish habitat from disturbances around surface water
 - Erosion and transport of sediments into surface water
 - Water withdrawal from Whitefish Lake
 - Releasing effluent to Whitefish Lake
 - Water management could result in changes to water quality affecting fish, fish habitat, and benthic invertebrates
 - Water management could alter stream flow or lake levels required for fish mobility and productivity
 - Reclamation of disturbed areas could increase sediments in water and change fish habitat

Mitigation Measures

- Limiting duration of in-water work: Conducting work during low-flow periods, and conducting work away from flows when possible
- Avoiding activities in windy or rainy conditions to limit erosion and sedimentation
- Plan activities in waterbodies to limit loss or disturbance to aquatic and sensitive habitat
- Limit shoreline degradation when operating machinery
- Stabilize shorelines to limit erosion and sedimentation by limiting clearing of vegetation and revegetating with native species, wherever possible
- Maintaining routes used for fish passage by designing water intake and treated water discharge locations to protect fish, fish movements, and fish habitats
- Planning to avoid chemicals entering waterways during near-water work
- Implementing an Erosion and Sediment Control Plan

Conclusions

- Effects are anticipated to be:
 - Low magnitude—no loss of habitat and fish population
 - Local—limited to Project area
 - Long term for habitat availability—throughout construction and operation
 - Short term for habitat distribution—fish movement protected throughout life of the project
 - Not significant—residual effects not expected to alter local fish populations

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Wheeler River VC: Relationship to the Land

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Environmental Assessment Considerations

- Resources availability
- Land availability
- Suitability of land and resources

Potential Effects

- The presence of the project and its activities may result in changes to:
 - Water, vegetation, fish, and wildlife
 - Access to the area
 - Land area available
 - Noise level, traffic, dust, and other disturbances associated with Project activities
 - Quality of the experience using resources
 - Opportunities for Indigenous land use activities
 - Opportunities for non-Indigenous land use

Mitigation Measures

- Implementation of measures to protect plants, fish, and wildlife
- Limit the area of disturbance
- Use of noise reducing equipment
- Reduce dust and air emissions
- Enforce speed limits for traffic
- Implement radiological clearance of equipment before exiting Project site
- Implement progressive reclamation of disturbed areas
- Establish community agreements
- Establish trappers' compensation
- Implement Indigenous People's Policy, including ongoing communication with Indigenous Communities of Interest

Conclusions

- Effects are anticipated to be:
 - Low magnitude—no loss of habitat and fish population
 - Local—Project area (in and around the local and regional study area)
 - Long term—until reclamation is complete
 - Not significant—continuous in frequency, low in impact, and fully reversible following decommissioning

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Wheeler River VCs: Community, Culture and Economy

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Environmental Assessment Considerations

- Populations, traffic, community infrastructure and services
- Income, employment, training, government revenues, business opportunities
- Community cohesion and traditional economy
- Employment and training (generally delivered through institutions connected to northern Saskatchewan)

Potential Effects

- Activities that could interact with community, culture, and economy:
 - Population numbers and population characteristics
 - Up to 300 jobs created during construction and more than 100 direct and contract roles during the operation phase
 - Supervisory, trades, professional, technical, and foundational (entry level) positions available during operations
 - Availability and increased opportunities for business and training
 - Participation in traditional economic activities
 - Abscense of Traffic
 - Increased demand on community infrastructure and services

Mitigation Measures

- Implementation of agreements with communities (support)
- Prioritize Indigenous and non-Indigenous Communities of Interest (employment, training, and business, wherever possible)
- Implement procurement approach focused on local communities
- Implementation of education and other support services for workers and in some cases their families
- Planned pick-up points in alignment with employment practices
- Implementation of Emergency Response Plan

Conclusions

- Effects on community well-being, infrastructure, services and economy are currently being assessed, and are anticipated to be:
 - Minimal adverse and/or positive
 - Low to moderate magnitude—during construction and operation, and low during reclamation
 - Local—primarily in the Project area
 - Short to medium—based on Project phases
 - Not significant—continuous in frequency, moderate in context, and fully reversible following decommissioning

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Wheeler River Risk Assessment

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To evaluate and understand if people, plants, and animals will be exposed to substances at amounts above what is known to be safe after the planned mitigation measures have been applied.

It incorporates the movement of substances through the food chain as well as direct exposure to substances (soil, air, water, etc.) to appropriately capture risk.

Human Health Risk Assessment

- People who access the project site are considered in the risk assessment. They include:
 - Camp workers
 - Seasonal resident/edge operator—seasonal access
 - People fishing/hunting/trapping/gathering firewood/picking berries—traditional and recreational access
 - Neighbouring residents fishing/hunting/trapping
 - Future permanent residents—access to Project site after its decommissioning

Assessment Results and Mitigation

- Low overall health risk to people using the area
- Expected radiation doses to people below public dose limit
- Low risk of exposure of people to metals in the environment (below benchmarks for metals)
- Ongoing monitoring during all Project phases

Ecological Risk Assessment

Considers ecological receptors such as:

- Terrestrial Mammals—Woodland Caribou, hare, moose, black bear, lynx, etc.
- Riparian Mammals—Muskrat, mink
- Terrestrial Birds—Bald eagle, robin, Canada goose, etc.
- Riparian Birds—Mallard, loon
- Fish—Northern pike, white sucker
- Aquatic Invertebrates—Zooplankton, benthic invertebrates
- Terrestrial Vegetation—Lichen, Blueberry, Labrador tea
- Aquatic Vegetation—Phytoplankton, Macrophyte

These can be exposed to substances through direct exposure in water, sediment, soil, air or through the food chain.

Assessment Results and Mitigation

- Low overall health risk to animals, plants, and invertebrates
- Expected radiation doses to ecological receptors below benchmarks
- No risk of exposure to ecological receptors to non-radionuclides hazards
- Ongoing monitoring during all Project phases

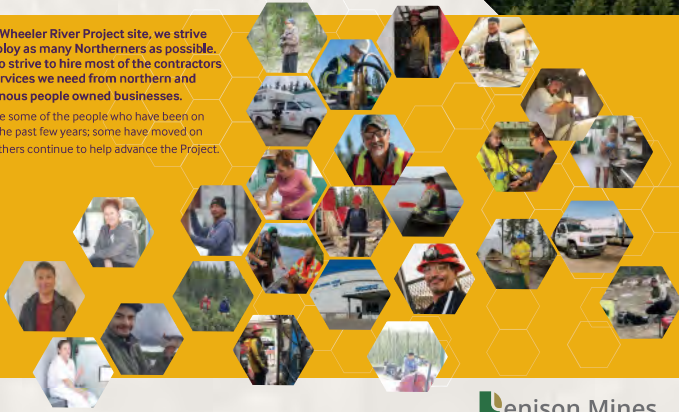
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Wheeler River Project People

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At the Wheeler River Project site, we strive to employ as many Northerners as possible. We also strive to hire most of the contractors and services we need from northern and Indigenous people owned businesses. Here are some of the people who have been on site in the past few years; some have moved on while others continue to help advance the Project.



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Wheeler River Building Relationships

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Denison and the Wheeler River Project team are committed to meaningful engagement with Indigenous people, communities, residents, and organizations with an interest in our Project.

TALKING together. LISTENING to you. RESPONDING to explain.

Engagement With Indigenous and Non-Indigenous Communities of Interest

- English River First Nation
- Kingsley Mills Local 89 (Ponchoal)
- Missis Naton - Saskatchewan
- A La Bale Mills Local 31 (Weila Cross)
- Siponik Mills Local 87 (Beauval)
- Patawaka Mills Local 82 (Patawaka)
- Northern Hamlet of Patawaka
- Northern Village of Pinehouse
- Northern Village of La la Croix
- Northern Village of Beauval

Other communities, organizations and groups of interest:

- Lac la Ponge Indian Band
- Black Narrows Dene Nation
- Buffalo River Dene Nation
- Hatchet Lake First Nation
- Black Lake First Nation
- Ford du Lac First Nation
- Heads Lake Tribal Council
- Yat'yé Néné Land and Resource Office
- Prince Albert Grand Council
- Headwaters Tribal Council
- Commercial Trappers
- Commercial Fishers
- Commercial Lodgers
- Cabin and lease owners

Thank You, Bobby John

Bobby John lived, trapped, fished and hunted in the Wheeler River Project area long before Denison and its predecessors started exploring the site. Over the years, Bobby John became someone our Project team relied on for insight on the area, for feedback on the Project proposal, for help with tracking wildlife and for assistance for our field teams, cutting through the bush and more. We will not forget Bobby John's contributions.

Since 2016 and every year after, Denison has met with community members and leadership through workshops, site tours, public meetings, and even virtual community meetings to hear concerns, receive knowledge and input, and share Project information. Subjects of workshops and meetings have included:

- Wheeler River Project components:
 - Access road
 - Treated water left/land discharge location
 - Mining method
 - Design change to freezing containment method
- Environmental considerations:
 - Water bodies - fishing
 - Fish habitat
 - Species at risk
 - Land disturbance

Our Support of Communities

Denison's support of communities can take various forms:

- Donations to community organizations
- Sponsorships of community events
- Sponsorships of in-kind support of education and field trips
- Direct agreements with specific Indigenous communities

Here are some examples of Denison's support in 2021:

- Entered into an Exploration Agreement with English River First Nation
- Metty Naton Saskatchewan Region 3 South Bay Gathering
- Starhawk (Barn) Group and their market garden initiative
- Pinehouse Lake hockey tournament
- Improvements to the English River First Nation Culture Camp at the Mawbey Reserve at 160km
- Many Christmas initiatives in the region, including those in Beauval, La la Croix, and the Hamlet of Patawaka

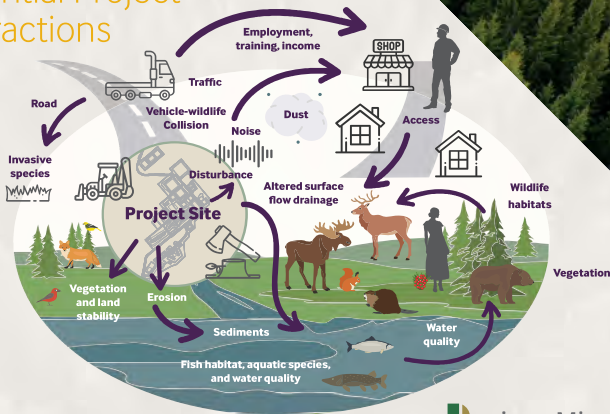


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Wheeler River Potential Project Interactions

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Guidance Materials

To get you started

Environmental Assessments and Licensing can be complicated. This panel has information to help.

Environmental Assessment

- Any new mine will result in changes to the environment. The goal is to understand what those changes could be, and to reduce them as much as possible.
- This is done through an Environmental Assessment.

Mitigation

- Through the Environmental Assessment process, we learn what the effects could be.
- Removing these effects or making them as small as possible is done through Mitigation.
- Examples of mitigation measures include:
 - Recycling and reusing process water to reduce water intake and water discharge
 - Implementing speed limits to reduce vehicle collisions with wildlife.



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Revised October 4, 2016 (2016)

Significance

- Applying mitigation measures to planned mining activities reduces or removes effects leaving behind potential remaining effects. Determining how significant these potential remaining effects are is called Significance Determination.
- Significance is determined by:
 - How big the effects are = Magnitude
 - Where the effect occurs = Magnitude + Geographic Extent
 - When the effect occurs = Time
 - How often the effect occurs = Frequency
 - How long the effect lasts = Duration
 - Can the effect be undone = Reversibility
 - Are there any additional environmental or social considerations = Context
- After all of this is assessed, a determination is made about how significant a potential effect would be.
- Denison must ensure that our new mine will result in no significant adverse effects.

Monitoring

- An important part of the Environmental Assessment process is determining what kind of monitoring is required.
- The purpose of monitoring is to confirm that changes to the environment and land are the same as what was predicted.
- Common mining project monitoring examples include:
 - Surface water testing at new and old locations.
 - Testing and observing wildlife, fish and habitats.
 - Groundwater testing for mining method performance.

Commitments

- As one of the final steps of the Environmental Assessment process, Denison's commitments will be listed which include mitigation, monitoring and other efforts.

Licensing & Permitting

- When the Environmental Assessment for a project is approved, it then moves on to a very important stage referred to as licensing and permitting.
- During this stage, the federal and provincial governments apply relevant legal requirements, standards, and guidelines to the project at a detailed level.
- Commitments may become legal requirements for the project, in addition to applicable requirements applied by the regulators.
- License types include:
 - Open License to Prepare Site, License to Construct, and License to Operate. Often these licenses are combined depending on what licensed activities a company aims to include.
 - Ministry of Environment Approval to Construct a Pollutant Control Facility and Approval to Operate a Pollutant Control Facility.
- For Denison, the two key regulators are the Canadian Nuclear Safety Commission and the Province of Saskatchewan's Ministry of Environment.

Powering PEOPLE, PARTNERSHIPS AND PASSION.

Land and Land Use Activities

Over the years, we have heard that this is important to you.

- What is the long-term impact to the land?
- I will consume the animals from my trapping, but there are fewer around than in the past.
- I fish in the area around Wheeler River.
- I might eat some berries while I am walking around.
- I am concerned about traditional land users and wildlife interruption.
- Will hunters and land users be restricted from accessing the area?
- Our ancestors have lived on our Traditional Territory since time immemorial.
- There are cultural sites and artifacts left throughout the region.

Environmental Assessment

We understand the importance of Land and Land Use in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Taking measures to protect plants, fish and wildlife.
 - Treating water to regulatory standards to protect aquatic life.
 - Limiting the Project footprint and using areas that have already been cleared.
 - Reducing dust and air emissions and using noise reducing equipment.
 - Reclaiming disturbed areas on an ongoing basis.
 - Establishing Trappers' compensation and various agreements.
 - Assessing areas prior to construction for cultural sites and artifacts.

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Revised October 4, 2016 (2016)

Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Surface Water and Groundwater**.

Monitoring

Main monitoring activities to be undertaken:

- Wildlife populations studies
- Bird surveys
- Fish populations surveys
- Vegetation sampling and testing

Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a simple format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to land and land use will be contained within licenses and permits once received.

Denison will ensure requirements related to land and land use are met through implementation of programs, plans, procedures etc. Some examples include:

- Effluent and Emissions Monitoring Plan
- Groundwater Protection and Monitoring Plan
- Biodiversity Management Plan
- Waste Management Plan



Surface Water and Groundwater

Over the years, we have heard that this is important to you.

- All animals are affected by water quality.
- What happens with groundwater monitoring once the mining is done and the freeze wall comes out?
- Will you be treating the discharged water?
- I swim in many different lakes.
- Will the freeze wall affect groundwater?
- How will you protect the water quality?
- What happens when the freeze wall melts? Will there be monitoring of groundwater during this?
- Is there any chance of the wells blowing and contaminating the ground around it?

Environmental Assessment

We understand the importance of Surface Water and Groundwater in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Reducing freshwater intake and release to Whitefish Lake.
 - Water treatment in place before release of treated effluent.
 - Recycling contact water for use as process water.
 - Recycling process water for re-use.
 - Establishing a monitoring system for wells and pipelines.
 - Designing pipelines to have a second barrier to minimize spills to the environment.
 - Crossing the freeze wall before mining operations as a third level of containment to prevent mining solution from entering into surrounding groundwater.

Denison Mines
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Revised October 4, 2016 (2016)

Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Surface Water and Groundwater**.

Monitoring

Main monitoring activities to be undertaken:

- Water testing prior to release to the lake
- Air testing
- Groundwater sampling and testing

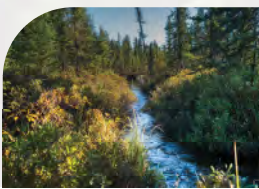
Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a simple format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Province of Saskatchewan will regulate project activities through an Approval to Operate. Conditions related to surface water and groundwater stewardship will be contained within licenses once received.

- Denison will ensure requirements related to surface water and groundwater are met through implementation of programs, plans, procedures, etc. Some examples include:
 - Waste Management Plan
 - Effluent and Emissions Monitoring Plan
 - Groundwater Protection and Monitoring Plan
 - Environmental Code of Practice



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Wildlife

Over the years, we have heard that this is important to you.

- Moose is what is in my freezer. Will the Project interrupt harvesting moose? Will I still be able to safely eat moose that I harvest?
- Will construction and operation harm moose and caribou populations?
- A lot of people live off that land, will the Project damage the animals?
- Would the chemicals being transported possibly harm wildlife?

Environmental Assessment

We understand the importance of Wildlife in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Limiting the Project footprint and using areas that have already been cleared.
 - Providing wildlife education and awareness training to staff.
 - Recording wildlife observations.
 - Ongoing reclamation of disturbed areas.
 - Surveying for habitat before clearing vegetation.
 - Working as quiet as possible, and avoiding clearing vegetation during denning and calving periods.
 - Putting up speed limit signs and wildlife crossing signs on Project roads.

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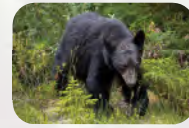
Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Wildlife**.

Monitoring

Main monitoring activities to be undertaken:

- Wildlife populations studies and testing
- Bird surveys and testing
- Fish populations surveys and testing
- Vegetation sampling and testing



Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a simple format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to wildlife stewardship will be contained within licenses once received.

Denison will ensure requirements related to wildlife are met through implementation of programs, plans, procedures, etc. Some examples include:

- Environmental Monitoring Plan
- Biodiversity Management Plan
- Waste Management Program
- Facility and Equipment Management Program



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Business and Work Opportunities

Over the years, we have heard that this is important to you.

- Seasonal workers need more opportunities. This will show us that you care.
- What are the economic opportunities? A new and smaller scale mining method can reduce jobs for the community. We need to learn about this kind of mining.
- What is your plan for training and for young people?
- For this new mining method, are there different types of jobs we should train for?
- We have been promised jobs in the past, but those promises were not kept. I'd like to see this change.
- Will you give site specific training, or training that is transferable?
- When the mine eventually closes a lot of people are going to lose jobs.
- What kind of employment opportunities will we see with Denison?

Environmental Assessment

We understand the importance of Business and Work Opportunities in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Prioritizing buying goods and services for the Project from local communities and communities in Northern Saskatchewan.
 - Prioritizing the hiring and training of local residents.
 - Establishing Trappers' compensation and various agreements.



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Revised October 4, 2016 (2016)

Significance

We have determined that there will be **No Significant Adverse Impacts on Business and Work Opportunities**. Local Northern Saskatchewan communities are expected to experience positive effects.

Monitoring

Main monitoring activities to be undertaken:

- Reporting on employment and business efforts

Commitments

Mitigation, monitoring, and other efforts are commitments that we have made. These will be outlined in a simple format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to business and work opportunities will be contained within licenses once received.

- Denison will ensure requirements related to business and work opportunities are met through implementation of programs, plans, procedures, etc. Some examples include:
 - Human Performance Program (Human Resource Development Plan)
 - Training Management Program
 - Surface Lease Agreement



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Commitments

Commitments are related to mitigation, monitoring, and various other efforts. A comprehensive list of Denison's commitments will be provided to regulatory bodies, after which they can become part of licensing. Some examples of commitments are listed below.



- Develop a Draft Caribou Management Plan with the Ministry of Environment.
- Survey before disturbance to inform species-specific mitigation.
- Monitoring to ensure engineering designs are being met.
- Wellfield surface pipes will have secondary containment and a leak detection system.
- In ground mining solution and UBS will have three layers of protection.
- Liners (such as those used for the industrial wastewater treatment plant precipitate pond, hazardous waste storage pond, and effluent monitoring and release ponds) will be designed based on materials being stored. Performance monitoring will be in place.
- Above ground, double walled, fuel storage tanks.
- Adjusting and developing mitigation measures as needed, as part of an adaptive management process.
- Hazardous substances managed appropriately: Procedures for spill management, handling, and cleanup located in accessible location.
- Fresh water wells and surface water intake specifics developed according to best practice and applicable standards.
- Treated effluent discharge adhere to approvals and regulations to protect wildlife and water.
- Speed limits to reduce dust and protect wildlife.

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Wheeler River Project – Denison Mines

mâci masinahamihk okâwiymâw askiy mêskopicikêwin wihtamasinahkan kâ-wî-itôtamihk atoskêwin

anima Wheeler River atoskêwin(anima atoskêwin) anima Denison itascikêwin êkota situ miskêwin (ISR) kaskatêw asiniy wâtihkêwin êkwa osihcikêwin misi-wikamik:

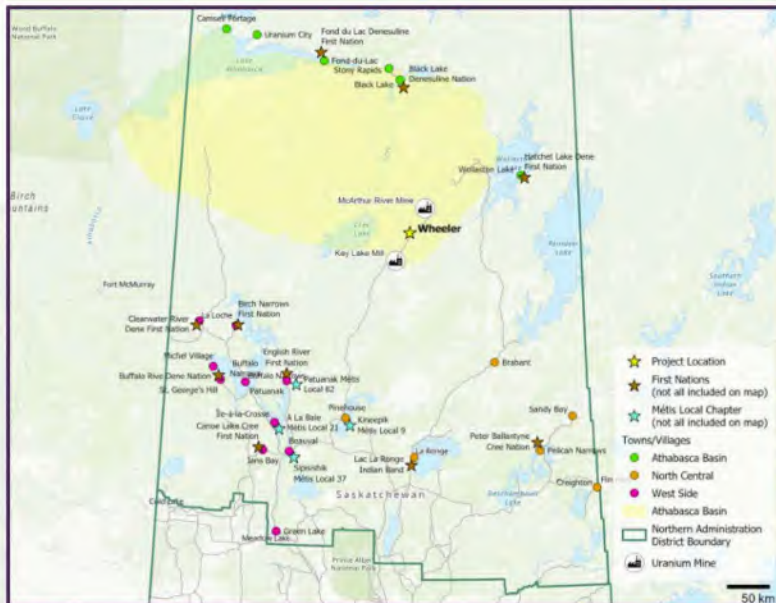
- tâtinitê: kîwîtinohk Saskatchewan, kanâta
- atoskêwin kîkwaya êkwa itôtamowina: anima tâwayihk atoskêwin kîkwaya anihi ISR wâtihkêwin êkwa anima osihcikêwin misi-wikamik. sihtoskamihk misi-atoskêwin kîkwaya êkwa itôtamowina astêwa kîkwaya osci wêpinikêwina, nipiy pimipayicikana, wâskwatawêpicikana, êkwa pimitâpâsowin, tâskoc tôhêwina, sâkahikanisa, wikamikwa, mêskanawa, êkwa pimihaakan mêskanaw.
- pihcâyihk: kanâtahk nipiy, nanâtohk âpoya (osci wâtihkêwin, kaskatêw asiniy osihcikêwin, nipiy kanâcihcikêwin), wâskwatawêwin êkwa pimiy.
- wayawê itôtamowina: wêpinikêwin (askiwiya, kanâti asiniy wêpinikêwina, pîtosî wêpinikêwin asiniy (wâtihkêwin askiy), cîki wêpinikêwin, misi wêpinikêwin, sâpipêwina ohci osihcikêwin wikamik êkwa nipiy kanâcihcikêwin, mîsêw âpoy) îhîwina mîna pêwâpisk kaskâpahtêwina (GHGs) kisêwêwin, êkwa kanâcihtâhk nipiy kâ-sîkipitamihk nipîhk.
- kîkway osihtâhk: U3O8 ahpô osâwi-wîhkikasikan. anima kîkway Denison atâwâkêcik apacihcikâtêw isi pimiy êkota kaskatêw asiniy wikamikohk, sihtoskamihk okâwiymâw askiy itôtamowin ka-nîkipitamihk GHG kaskâpahtêwina.
- atoskêwin: nântaw 300 atoskêwiyniwak kâ-osihtâhk êkwa 180 ikospê atoskêwin. anima pimipayicikêwin ka-pihci-pimihaak êkwa wayawê-pimihaak atoskêwin.
- atoskêwin ispayik, 5 askiy osci pônihkamihk, êkwa 15 askiya osci kîsihtâhki-pônihkamihk ispayihowina.

anima okâwiymâw askiy kinwâpahcikêwin (EA) kâ-masinahikâtêk ôta okâwiymâw askiy mêskopicitamihk wihtamâkêwin (EIS) kinwâpahcikâtêw êkwa nanisihkâc, askôhamihk itôtamowin ka-kinwâpahtamihk atoskêwina tâskoc mêskocipayinwa. Kakwê osihtâhk kanawêyicikêwin EA masinahamihk, ahpô ayiwâk pihci, anima nistohtamowin misi-atoskêwin osihcikêwina. Tâskoc, anima tipêyaw nakatamowin osci osihcikêwak masinahikêwina nântaw 75 ha, mâka anima EIS itêhtamwak anima atoskêwin mêskocipayiwin cîki 170 ha. pêyakwan, tahto askiy osihcikêwin osci osihcikêwak osihtâwin anima 6 Mlbs U3O8 tahto askiy iskohk 10 askiya, mâka EIS itêhtamwak osihtâwin 9 Mlbs U3O8 tahto askiy isi 15 askiya, mîna mistahi itôtamowin iskohk 12 Mlbs U3O8 askiy osci itôtamowin waskawêwin. Itastêw, tâskoc, anima EIS kinwâpahtamwak pihcâyihk nitawêhtamihk êkwa wayawêwina osihtâhk tahtwâ askiy 50% ayiwâk kâ-itêhtamihk.

kîkwaya kâ-astêki kâ-kîsi kanâcihtâhk ikospê pihtaw osci askiy ê-kîskatahikâtêk, ayiwâk ayisîniwak ê-pimitâpâsocik, kaskâpahtêw, wêpinikêwina, êkwa nipiy pimipayicikêwin. Kîkway kâ-ispayiki kinwâpahcikâtêwa êkwa itasiwâtamihk anihi EIS anima atoskêwin kâ-kî-osihcikâtêw, pimipayicikâtêw, êkwa pônî-apacihcikâtêw ikospê misi-wikamikwa êta kâ-wîkîcik miywâsinwa êkwa ahkami apacihcikâtêwa, kinosêwak êkwa pisiskiwak miywâyâwak, ayisîniw miywâyâwin kanawêyicikâtêw, astêwa kîkway ka-apacihcikâtêw askiy, tâskoc iyiniw pakitinikowisowina, êkwa ahakami kiyohkêwin êkwa sônîyahkêwin. Anima EIS itasinahikâtêw kwayisk itôtamowina, kinwâpahcikêwina, êkwa asotamâkêwina osci Denison ka-ayâcik sohkêyimowin anima atoskêwin ê-pimipayik êkwa ispayihowin osci atoskêwin osihtâwin, pimipayicikêwin, pônî-apacihcikâtêk astêwa êkota ahpô apisîs itêhtamowina ispayihowina.

misawê, ôma atoskêwin itêhtâkwan kwayisk ta-ispayik askîhk pihci kotakwa wâtihkêwina. pihtaw osci, anima ISR wâtihkêwin itôtamowin, anima atoskêwin astêwa namôya mistahi kîkway ê-nakacikâtêki kâ-kîsi-kanâcihtâhk pihci kotakwa wâtihkêwina ahpô atâmihk askîhk wâtihkêwina êkwa kotakwa itôtamowina.

mistêhtâkwan, Denison pâ-pîkiskwâtêwak iyiniwak êkwa kotakwa atoskêwikamikwa, ayisîniwak, êkwa kanawêyicikêwak ikospê 2016. Mâmawi itôtamowin isi pîkiskwêwin êkwa yahtohtahikêwin osci anima atoskêwin wihtamwak ôki ayisîniwak ka-miyo-ispayiki atoskêwina êkwa anihi EA nanâtohk êsi. Denison wâpahtamwak anima EIS tâskoc mistêhtâkwahk wiycikêwin kîkway ka-sihtoskamihk nîkânihk itôtamowina êkwa pîkiskwêstamwak pêyak itôtamowin êkota kâ-ayimahk EA, masinahikêwin, êkwa pakitinamihk kaskatêw asiniy wâtihkêwin wikamik êkota kanâta.



tântê

anima Wheeler River atoskêwin
astêw êkotî kiwîtinohk
Saskatchewan êkota Athabasca
kapâwin.

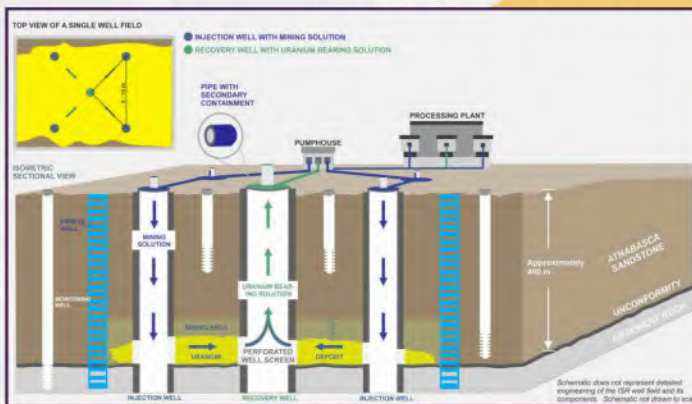
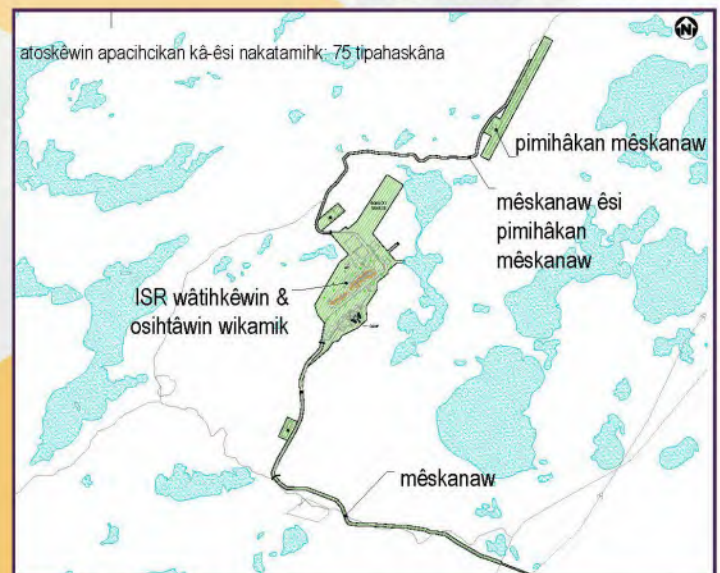
atoskêwin kâ-êsi nakatamihk

animi kihci atoskêwin
apacihcikana astêwa êkota situ
kâwi-miskamihk wâtihkêwin
êkwa osihtâwin wikamik.

êkota SITU kâwi-miskamihk

êkota situ kâwi-miskamihk apacihcikâtêw kisitêk
âpoy ka-otinamihk kaskatêwi asiniya osci askîhk
isi cîstamihk êkwa kâwi mônahipâna. Anima
osihtâwin wikamik astêwa maskimota êkwa
apacihcikana ka-otinamihk kaskatêwi asiniy osci
situ kâwi-miskamihk isi osâwi wihkihasikan.

Denison ka-atâwâkêwak anima osâwi
wihkihasikan ka-apacihtâhk ka-sipwêpitamihk
wâskwatawêwikamikwa, sihtoskâtahkik
okâwiymâw askiy itôtamowina ka-nîkipitamihk
pihcupowi kaskâpahtêwina.



mistakihtêki apacihcikana & atoskêwina waskawêwina

Denison kinwâpahtwak kîkwaya,
isihkâtêki mistakihtêki ispayihowina osci
anima atoskêwin êyikoni kîkwaya.



Wheeler River Project – Denison Mines

Ēłóchëlë Nih Bazi t'áú nih besoídi ha si erit'is.

T'aghá Holnį si diri nih bazi nuhhel kodi hasj.

Diri Wheeler River – Denison Mines nih sēnolye ha si, t'au nih nághįna ha (situ) Yanathē tthe ghą nade ha si.

- Yathé nene diri Saskatchewan k'eyaghē hoʔą si Canada tth'i k'eyaghē.
- Diri t'au tu t'arat'į si senalye ha, t'a ghą nade si konųhełnį ha. Kon/tthe slįnį (Uranium) senalye seráde ha, tulu k'e ts'etai sēlye, yoh tth'i ts'etai sohúde ha. Beyets'et'ali neltła ha tth'i senuhut'a ha. T'aʔu tu t'arat'į si (tu slįnį) sohulye ha. Diri t'aʔu nih t'arat'į si senalye ha hodi sj.
- 'Senahulye de, tu nezų, tthe slįnį t'aʔu senalye ha. Kon bēt'á asi hēt'ěl si, t'ēs tth'i ts'etai sēlye si."
- Ku diri halye ha si, t'áchaghē, tthe t'a bohełtaile si, t'aʔu nih dałdhe nįsi, tu, tujērē-ú, tsą tue-ú, t'aʔu tthe t'arat'į si tu hēł si, sēlye ha. Ku diri asi ghą nade t'a horehth'a si ya bazį tth'u. T'a tu senalye si eyi tth'i hahodi.
- Diri tthe slįnį (uranium) łes ʔahot'į alye si bēt'á kon hołe, kon heltsi ha. Diri kon uranium t'a holį de, dēhth'agh hile snį.
- Diri nih Senahulye si bónįther de tononą (300) ts'etai sohulye ha si. Łononą- įłk'etoną tth'i Dene ēghádálana ha sj. Diri bónįther de beyets'et'ali t'arat'į ha.
- Diri t'a bēghą Eghalada ha si tóną-įłk'edįghį nene-ú, nake nene ts'etai sohúde ha-ú, sọlaghe nene t'a nuhųt'ą si nanelye ha, Sọlaghe ts'adhel nene ts'etai senahulye ha.

Diri nih senahulye si horelyų net'į, nih-ú, ya-u t'áú besuwidi ha.

T'aʔu nih ts'etai sēlye ha si, t'a Dene yēghą erit'is dałtsi hotié dezá (engineering), erit'is nédhé bets'į dezá, t'aʔu nih hotié ts'etai ʔalye ha.

Diri t'aʔu aresį henį, nih nechozē ʔańį sj, įlaisdįghį nih hultsai anįtttha u, kuli horįchoze ʔats'edi sj, T'a ha seráde si tthe slįnį (uranium) halye ha hodi sj łonēną nene ha hodi. Ku diri t'a the slįnį halye hasi, sọlaghe ts'adhel nene tthe nezų halye ha henį. T'át'u tthe įłk'etaghē limil (łonēną ąnelt'e) ʔaįđdath henį, kuli lota limil tthe hilchu has henį. Kuli sọlaghe ts'ēdel nene anįtttha de nake ts'adhel limil ʔaįđdath the hilchu hasi. Eyi t'a soloną (percent) hoʔanelt'e tthe hilchu ha henį sj.

Diri bēt'á Eghalada si t'au nih ts'etai sēlye si, bēhchēnē tth'i la ha-ú, horetth'a t'au, asiʔaldel tth'i ła-ú, tu t'a bēt'á Eghalada si besorįthēn ha la. ʔątu nih, tu-ú, ya ts'en boʔēłta hasą. Kuli yedołnį ha henį.

Diri bēghą Eghalada si, yēghą ēghadálghēna hoyaghē ts'etai sedáhúlye-ú, łue-ú, nųneshe, ēch'ērē, hotié besoídi ha, Dene t'a dąghēna. Denesųłine nih t'a dąghēna la, nuhhenene theri hoʔą. Nih-u, tu-ú, ya-ú nuųha besudi hoʔą.

Diri t'aʔu nih ghą ēghádálana si hotié bahodi, t'aʔu erit'is holį si hotié dézá, t'aʔu ts'etai sohúde-ú, t'aʔu ēghádálana-u, t'aʔu nih senalye si hotié dézá.

Diri t'aghą ēghádálana si hotié nih hodi ha henį, yanįzi t'aʔu nih hesdohołts'į si konalyehaile dųų henį. T'a tthe nih-u, tu-u, ya-u bēt'á nezųle ni, dųų tthe slįnį si bēt'á nih-u, tu-u, ya-u hesedowełnį ha henį. T'a tthe nih horįcha nailts'el nį, nih yaghē tth'i dēgharē nih nárałts'ul nį – dųų kone haile henį.

Dųų de t'a benenē k'e ēghadálghēna si bedóghelįnį dézá, hotié t'a ghą ēghadalaida si bełkoridi hoʔą 2016 hots'į. Diri t'a bēghą náide si t'a benenē si beł hoʔą. Nih hodi hoʔą, tu-u, ya-u boghedi ha. Diri t'a erit'is beł'azi (license) si, horelyų sohúde dézá, diri Canada k'eyaghē tthe slįnį ghą naidi hade.



LOCATION

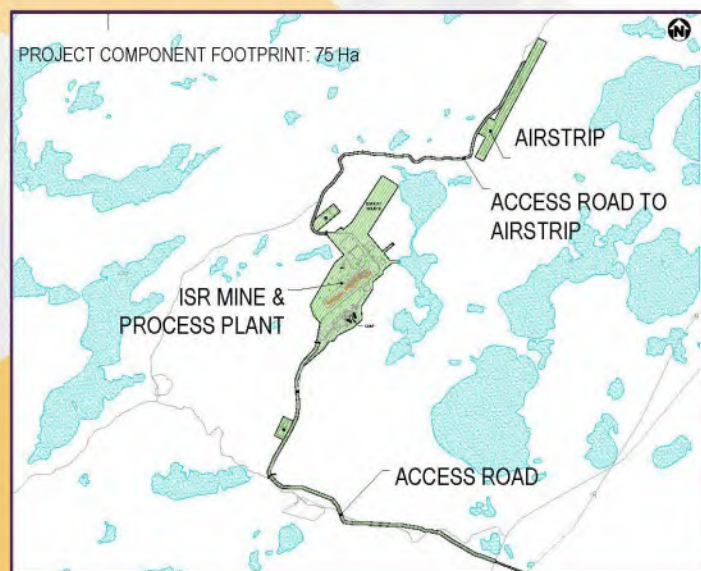
Ku diri k'eyaghë deht'is si t'a ts'en ëghadálghëna hasi horet'ì – Dene nenene k'e.

PROJECT FOOTPRINT

Diri t'a yet'a nih ghà nade has si deht'is sj.

IN SITU RECOVERY

Diri tu het'el t'a tthe slìnj hìlchu, horìcha horet'ì la, t'at'u tthe sëralye si bët'a les hoë. Ku eyer hots'ì les bëghà nánì, horelyu nene k'e, t'a horehtth'a ch'a hodołni sj. Eyi ʔarałnj Greenhouse Emissions, diri nih k'e náide si besoìdi ha.



VALUED COMPONENTS & PROJECT INTERACTIONS

T'aʔu nih besoìdi hasi Dene yek'odarëlya hasa.



Wheeler River Project – Denison Mines

Draft Environmental Impact Statement

Project Overview

The Wheeler River Project (the Project) is Denison's proposed in situ recovery (ISR) uranium mine and processing plant:

- Location: northern Saskatchewan, Canada.
- Project components and activities: the central Project components are the ISR mine and the processing plant. Supporting Project components and activities include those needed for waste management, water management, distribution of electricity, and transportation, such as pads, ponds, buildings, roads, and an airstrip.
- Inputs: freshwater, chemicals (for mining, uranium processing, treating water), electricity, and fuel.
- Outputs: waste (organics, clean waste rock, special waste rock (drilling core), domestic waste, industrial waste, precipitates from the processing plant and water treatment, sewage), air emissions including greenhouse gas emissions (GHGs), noise, and treated effluent.
- Product: U_3O_8 or yellowcake. The product Denison sells is ultimately used as fuel in nuclear power plants, supporting global efforts to reduce GHG emissions.
- Employment: Approximately 300 workers during Construction and 180 during Operation. The Project will be operated as a fly-in-fly-out operation.
- Project duration: Total of approximately 38 years, about 2 years for Construction, 15 years for Operation, 5 years for Decommissioning, and 15 years for Post-Decommissioning periods.

The environmental assessment (EA) outlined in this environmental impact statement (EIS) was transparent and conservative, following a standard, step-wise approach for evaluating Project effects including cumulative effects. In an effort to generate a conservative EA and provide operational flexibility, Denison developed an assessment basis for the EA which bound, or was higher than, the current understanding of the Project's engineering design basis. For example, the direct Project footprint based on engineering site plans is about 75 ha, but the EIS assumed the Project's area of disturbance was closer to 170 ha. Similarly, the annual production for current engineering design is 6 Mlbs U_3O_8 per year over 10 years, but the EIS assumed production of 9 Mlbs U_3O_8 per year over 15 years, with a peak production up to 12 Mlbs U_3O_8 in a given year to allow for operational flexibility. This means that, for example, the EIS assessed inputs needed and outputs generated on an annual basis as being 50% more than expected.

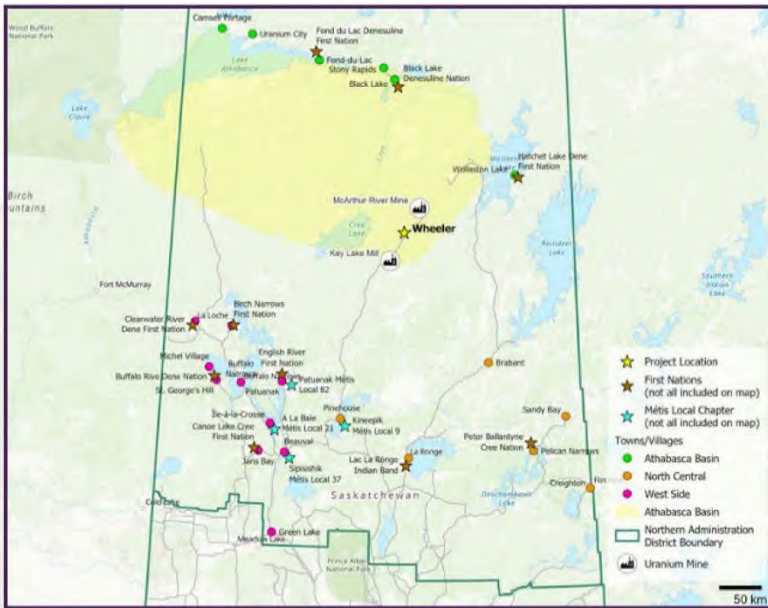
Residual effects remaining after mitigation were largely linked to land clearing, increases in traffic, emissions to air, waste generation, and water management. Residual effects were evaluated for 32 Valued Components (VCs) and significance determined for receptor VCs. The evaluations and conclusions of the EIS are that the Project can be constructed, operated, and decommissioned while regional plant communities are stable and continue to function, regional fish and wildlife populations are viable and healthy, human health is protected, there is continued opportunity for land use activities, including exercising Indigenous rights, and there is continued social and economic viability of local economies. The EIS outlines mitigation measures, monitoring requirements, and commitments needed for Denison to have confidence that Project is operating as planned and that the actual effects resulting from Project Construction, Operation, and Decommissioning are at or below predicted effects.

Overall, the Project has the potential to achieve a superior standard of environmental sustainability when compared to conventional uranium mining operations. Owing, in large part, to the use of the ISR mining method, the Project has potentially fewer residual effects remaining after mitigation when compared to conventional open pit or underground mining methods and conventional milling activities.

Importantly, Denison has been proactively engaging with Indigenous communities and organizations, the general public, and regulatory agencies since 2016. The use of a collaborative approach to engagement and advancement of the Project is exemplified by the input these groups have provided to influence both project designs and the EA in various ways. Denison views the EIS as an important planning tool that will be used to support future activities and represents one stage in the rigorous EA, licensing, and permitting process for a uranium mining facility in Canada.

LOCATION

The Wheeler River Project is located in northern Saskatchewan in the Athabasca Basin.

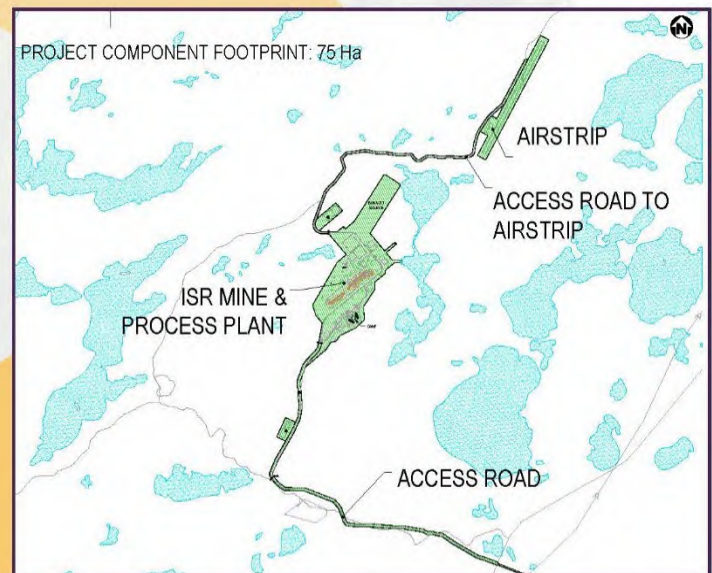


PROJECT FOOTPRINT

The main Project components are the in situ recovery mine and the processing plant.

IN SITU RECOVERY

In situ recovery uses an acidic solution to leach uranium ores from the ground through a series of injection and recovery wells. The processing plant houses the tanks and equipment to process the uranium recovered from in situ recovery into yellowcake. Denison will sell the yellowcake to the market for use in nuclear power plants, supporting global efforts to reduce greenhouse gas emissions.



VALUED COMPONENTS & PROJECT INTERACTIONS

Denison is assessing elements, called valued components, important to people or the environment, and the potential effects of the Project on these elements.



Wheeler River Project Overview

We acknowledge and respect the fact that Denison's flagship Wheeler River Uranium Project is located in northern Saskatchewan within the boundaries of Treaty 10, in the traditional territory of English River First Nation, in the homeland of the Métis and within Nuhené.

| Environmental Impact | Environmental Risk | Environmental Risk | Environmental Risk |
|--|--|---|---|
| <ul style="list-style-type: none"> Small surface footprint No conventional tailings facility No underground workings - mining done from surface Low energy consumption Small volume of treated effluent Small volumes of clean waste rock (sandstone drill cores from wellfield drilling) Small volume of treated water precipitates Small volumes of waste rock (mineralized drill cuttings from wellfield development) | <ul style="list-style-type: none"> Introduces opportunity to develop potential mineral deposits not considered economically viable by conventional mining methods | <ul style="list-style-type: none"> Protection of surrounding groundwater regime Significant evaluation efforts required to confirm ISR mining method is viable for high grade Phoenix deposit | <ul style="list-style-type: none"> Environmental baseline studies ongoing since 2012 Federal and provincial EA process initiated in May 2019 with submission of Project Description Environmental studies are completed to inform engineering design and mitigate potential effects of the project on the biophysical and human environments |

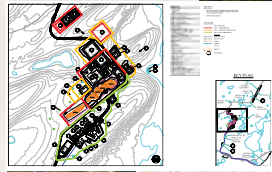
Key Advantages of ISR Mining

- Small surface footprint
- No conventional tailings facility
- No underground workings - mining done from surface
- Low energy consumption
- Small volume of treated effluent
- Small volumes of clean waste rock (sandstone drill cores from wellfield drilling)
- Small volume of treated water precipitates
- Small volumes of waste rock (mineralized drill cuttings from wellfield development)

- Introduces opportunity to develop potential mineral deposits not considered economically viable by conventional mining methods

Considerations of ISR Mining

- Protection of surrounding groundwater regime
- Significant evaluation efforts required to confirm ISR mining method is viable for high grade Phoenix deposit



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Wheeler River Project Technologies

In Situ Recovery

- Use an acidic or low pH mining solution to leach uranium ores from the ground
- Mining solution is a mixture of sulphuric acid, hydrogen peroxide and ferric sulphate
- Freshwater obtained from shallow groundwater or surface water
- Mining solution expected to be reused over and over, wherever possible
- Use mud rotary drilling to create wellfield - most common method of well drilling in Saskatchewan

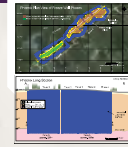
ISR Process Overview



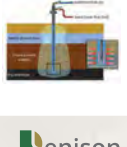
Ground Freezing - Freeze Wall

- Ground freezing used to prevent groundwater in the sandstone from flowing through the uranium deposit
- Uranium deposit will be surrounded by an engineered freeze wall to isolate mining area from groundwater flow
- Freeze wall surrounding deposit from the basement rock to surface
- Use of groundwater wells for monitoring of the mining solution, groundwater level, ground pressure and temperature
- Freeze wall established by +300 freeze holes 6m apart from surface to low permeability basement rock
- Freeze wall holes made using diamond drilling method
- Chilled brine solution (calcium chloride brine) will circulate in the steel encased holes to remove the heat from the ground
- Warm brine solution flows out to surface to be re-chilled in a closed loop system - similar to how a community ice rink is kept frozen
- Commonly used technology at McArthur River and Cigar Lake

Proposed Freeze Wall



Typical Freeze Pipe



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Wheeler River Regulatory Process

Federal Regulators

Lead: Canadian Nuclear Safety Commission

- Reviews and approves Environmental Impact Statement (EIS) and licence applications
- Mandate to protect health, safety and security of Canadians and the environment

Main authorizations granted include:

- License to Prepare Site and Construct
- License to Operate

Provincial Regulators

Lead: Saskatchewan Ministry of Environment

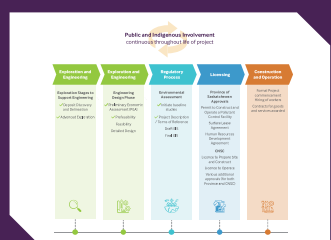
- Understand and evaluate potential environmental impacts of a project before any irreversible decisions are taken that may lead to negative effects on the environment, natural resources, or public health and safety
- Grant regulatory permits or licences
- Review and approve Environmental Impact Statement (EIS)

Main authorizations granted include:

- Permit to Operate a Pollutant Control Facility
- Surface Lease Agreement

Wheeler River Project Process Status

- Environmental baseline studies ongoing since 2012
- Federal and provincial EA process initiated in May 2019 with submission of Project Description
- Environmental studies are completed to inform engineering design and mitigate potential effects of the project on the biophysical and human environments



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Wheeler River Understanding Environmental Assessment (EA)

Valued components

What are VCs?

It stands for Valued components. These are elements that are important to humans or the environment. Because viewpoints can vary, it was important to consult with northern communities to identify appropriate valued components.

When determining VCs, we used input from multiple northern communities:

- English River First Nation,
- Kinepik Métis Local #9,
- Pinehouse Lake,
- Beauval,
- De la Crosse,
- Patawaka, and
- The seven Athabasca Communities represented by the Y'athi Nêhé Lands and Resources Office

VCs were determined to be Air, Humans, Indigenous Land and Resource Use, Ground/Terrain/Soil, Vegetation, Water, and Wildlife.

Project Interactions

How will the project impact VCs? The project has several phases and activities that can interact with VCs. These are:

- Preparation
- Operation
- Decommission
- Waste Management
- Water Management

We undertake actions to eliminate or reduce negative project impacts on VCs. These actions are called mitigation measures.



Significance

Can the impacts to VCs be effectively managed?

We study many considerations before making conclusions on whether impacts are significant. Residual adverse effects must be determined. These are the effects left after mitigation measures. Then, we answer questions about the residual adverse effects of each VC:

- Magnitude-How big is the effect?
- Geographic extent-Where do the effects occur?
- Time-When do the effects occur?
- Frequency-How often do the effects occur?
- Duration-How long do the effects last?
- Reversibility-Can the effects be undone?
- Context-Are there environmental or social factors to consider?

Surrounding projects, laws, policies, communities, practices, and land use, reliability of mitigation, multiple sources of knowledge, and many other factors can influence VC conditions. These factors are evaluated, considering the baseline conditions, to make a conclusion on significance.

A conclusion of "not significant" does not mean that an adverse effect won't occur or isn't important relative to people or the environment—it is simply a conclusion that the potential changes can be effectively managed.

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Wheeler River VCs: Vegetation, Ecosystems and Wetlands

Environmental Assessment Considerations

- Abundance of vegetation
- Chemical make-up of the constituents
- Listed Plant Species

Potential Effects

Activities that could reduce or disturb vegetation, listed plant species, and wetlands:

- Introduction of weeds
- Generation and deposition of dust
- Changes to water quality
- Storage, handling, and transport of waste
- Reclamation of disturbed areas

Mitigation Measures

- Limit the area of disturbance
- Use of existing clearings and previously disturbed land
- Cleared bush will be stockpiled and used in progressive reclamation
- Implementation of controls to limit dust generation
- Secondary containment of tanks and pipelines to contain accidental leaks and spills
- Minimize risk of accidental spills through the Fuel Management and Spill Control Plan
- Mining solution and process water will be reused whenever possible to reduce water required for the Project and to reduce treated water released to the environment

Conclusions

- Effects are anticipated to be:
 - Low magnitude - less than 0.1% of wetlands lost; about 2.9% of habitat types potentially affected in the local area
 - Local - limited to areas disturbed by the project
 - Long term - throughout the project life cycle
 - Not significant - residual effects are not expected to alter vegetation and ecosystems integrity (sustainability)

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Wheeler River Cumulative Effects Assessment

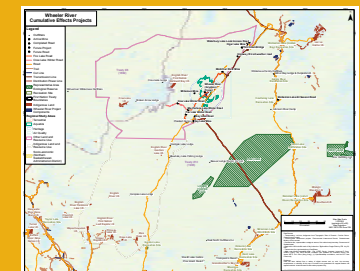
A Cumulative Effects Assessment (CEA) is completed to ensure that the incremental effects from multiple activities in an area (environment, human health, land use, etc.) are considered together. Project activities can interact with Valued Components; when interactions cause Valued Components' conditions to change, it is known as an "effect". The combined effects may be significant even though the effects of each independent activity is not significant.

Cumulative Effects Considerations

- The cumulative effects (overlapping effects) were characterized to inform the CEA
- The significance of the cumulative effect was determined for each Valued Component
- The Cumulative effects for all of the Valued Components were predicted to be Not Significant

Key Points of a CEA

- Completed for each of the selected Valued Components.
- Uses established assessment methods.
- Includes Indigenous, local and scientific knowledge.
- Conducted at the regional level for each Valued Component.
- Baseline conditions of the Valued Components reflect the effects from past and present projects and activities.
- Identifies overlapping residual effects (such as time and space) from the Project, with residual effects from known projects and/or activities from past, present, and future projects and/or activities.
- Considers all known projects and activities, and climate change.



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Wheeler River VCs: Ground, Terrain and Soil

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Environmental Assessment Considerations

- Land stability
- Soil quantity, quality and nutrients

Potential Effects

- Activities that could impact land stability, surface drainage patterns, surface erosion potential, soil quality, and soil quantity:
 - Clearing, grading, and construction
 - Unexpected spills, leaks
 - Release of water to groundwater and/or surface water bodies

Reclamation of disturbed areas may result in similar Project-related effects, but to a lesser extent.

Mitigation Measures

- Limit the area of disturbance
- Construction strategies to eliminate or reduce impacts
- Use of existing clearings and previously disturbed land
- Reusing disturbed sources of soil nutrients, generated during construction, for the reclamation process
- Installation of sediment/erosion controls and surface water management features
- Monitoring of open-source dust associated with major earthworks and equipment travel
- Fuel Management and Spill Control Plan in place to respond to unexpected leaks, spills, and releases of materials
- Wherever possible, progressive reclamation will be conducted throughout the life of the Project in relation to landscape features (slope, aspect) and surface drainage patterns

Conclusions

- Effects are anticipated to be:
 - Low magnitude—within range of natural variations
 - Local—limited to areas disturbed by the project
 - Medium term—up to, but not including post-decommissioning
 - Not significant—residual effects are not expected to alter VCs integrity and sustainability nor their availability to contribute to the environment

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Wheeler River VCs: Wildlife and Birds

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Environmental Assessment Considerations

- Populations and health of wildlife including:
 - Ungulates: Moose, Woodland Caribou
 - Furbearers: Wolverine, Mink, Muskrat
 - Birds: Bald Eagle, Osprey, Common Nighthawk, Short-Eared Owl, Watershrike, Game Birds, Songbirds, Yellow Rail, Rusty Blackbird, Olive-Sided Flycatcher

Potential Effects

- Activities that could reduce or disturb species of wildlife, birds, or habitats include:
 - Vehicles, equipment, and aircraft traffic
 - Dust
 - Human presence
 - Collisions with equipment and vehicles
 - Entrapment in facilities
 - Exposure to substances in dust
 - Release of Project-related treated effluent
 - Spills of hazardous materials
 - More efficient hunter, trapper, and predator access to the Project area via new access routes
- Changes to surface water quality could affect wildlife habitat and health from water management practices.
- Decommissioning of Project site may result in a continued alteration of wildlife habitat and/or mortality from vehicle-wildlife collisions.

Mitigation Measures – Wildlife Management Plan

- Limit the area of disturbance
- Use of existing clearings and previously disturbed land
- Site clearing scheduled to avoid times when animal and birds are denning, raising, breeding
- Nesting surveys conducted before clearing to identify and establish measures to protect dens, burrows, lodges, nests, and other habitat
- Measure and practices to reduce the generation of dust
- Secondary containment of tanks and pipelines to contain accidental leaks and spills
- Implementation of Fuel Management and Spill Control Plan
- Fencing and monitoring contaminated areas—waste ponds and pools, landfill
- Implementation of Woodland Caribou Management Plan
- Employees trained to minimize their impact on wildlife, such as no littering, respect for wildlife, etc.
- Implementation of speed limits to reduce risk of collisions with wildlife
- Waste and hazardous materials collected and temporarily stored in wildlife-proof containers

Conclusions

- Effects are anticipated to be:
 - Low magnitude—risk of mortality within range of natural variations
 - Regional effect on habitat loss—limited to Project area
 - Local effect on mortality—direct mortality within Project area from vehicle-wildlife collisions, but indirect mortality could extend beyond Project area
 - Medium term for long-term—highest loss of habitat and mortality vehicle-wildlife collisions expected during construction and operation, but may continue during other phases of the project
 - Medium to long term for furbearers, raptors and select bird species—loss of habitat and mortality vehicle-wildlife collisions expected during construction and operation
 - Long term—moderate effects not expected to alter habitat integrity nor wildlife and bird regional populations sustainability

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Wheeler River VC: Aquatic Environment

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Environmental Assessment Considerations

- Fish habitat availability and distribution
- Fish survival and reproduction
- Surface water levels and flow
- Concentration of chemicals and metals in surface water
- Concentration of chemical and metals in aquatic sediments
- Distribution and survival of snails, worms, dragonfly larvae, and other benthic invertebrates

Potential Effects

- Activities that could reduce or disturb aquatic environments, species, or habitats:
 - Modification of fish habitat from disturbances around surface water
 - Erosion and transport of sediments into surface water
 - Water withdrawal from Whitefish Lake
 - Releasing effluent to Whitefish Lake
 - Water management could result in changes to water quality affecting fish, fish habitat, and benthic invertebrates
 - Water management could alter stream flow or lake levels required for fish mobility and productivity
 - Reclamation of disturbed areas could increase sediments in water and change fish habitat

Mitigation Measures

- Limiting duration of in-water working (conducting work during low-flow periods, and conducting work away from flows when possible)
- Avoiding activities in windy or rainy conditions to limit erosion and sedimentation
- Plan activities in waterbodies to limit loss or disturbance to aquatic and sensitive habitat
- Limit shoreline degradation when operating machinery
- Stabilize shorelines to limit erosion and sedimentation by limiting clearing of vegetation and revegetating with native species, wherever possible
- Maintaining routes used for fish passage by designing water intake and treated water discharge locations to protect fish, fish movements, and fish habitats
- Planning to avoid chemicals entering waterways during near-water work
- Implementing an Erosion and Sediment Control Plan

Conclusions

- Effects are anticipated to be:
 - Low magnitude—no loss of habitat and fish population
 - Local—limited to Project area
 - Long term for habitat availability—throughout construction and operation
 - Short term for habitat distribution—fish movement protected throughout life of the project
 - Not significant—residual effects are not expected to alter local fish populations

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Wheeler River VC: Relationship to the Land

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Environmental Assessment Considerations

- Resources availability
- Land availability
- Suitability of land and resources

Potential Effects

- The presence of the project and its activities may result in changes to:
 - Water, vegetation, fish, and wildlife
 - Access to the area
 - Land area available
 - Noise level, traffic, dust, and other disturbances associated with Project activities
 - Quality of the experience using resources
 - Opportunities for Indigenous land use activities
 - Opportunities for non-Indigenous land use

Mitigation Measures

- Implementation of measures to protect plants, fish, and wildlife
- Limit the area of disturbance
- Use of noise reducing equipment
- Reduce dust and air emissions
- Enforce speed limits for traffic
- Implement radiological clearance of equipment before exiting Project site
- Implement progressive reclamation of disturbed areas
- Establish community agreements
- Establish trappers' compensation
- Implement Indigenous People's Policy, including ongoing communication with Indigenous Communities of Interest

Conclusions

- Effects are anticipated to be:
 - Low magnitude—no loss of habitat and fish population
 - Local—Project area (in and around the local and regional study area)
 - Complete—until reclamation is complete
 - Not significant—continuous in frequency, low in impact, and fully reversible following decommissioning

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Wheeler River VCs: Community, Culture and Economy

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Environmental Assessment Considerations

- Populations, traffic, community infrastructure and services
- Income, employment, training, government revenues, business opportunities
- Community cohesion and traditional economy
- Employment and training (generally delivered through institutions connected to northern Saskatchewan)

Potential Effects

- Activities that could interact with community, culture, and economy:
 - Population numbers and population characteristics
 - Up to 300 jobs created during construction and more than 100 direct and contract roles during the operation phase
 - Supervisory, trades, professional, technical, and foundational (entry level) positions available during operations
 - Availability and increased opportunities for business and training
 - Participation in traditional economic activities
 - Abscendence of Traffic
 - Increased demand on community infrastructure and services

Mitigation Measures

- Implementation of agreements with communities (support)
- Prioritize Indigenous and non-Indigenous Communities of Interest (employment, training, and business, wherever possible)
- Implement procurement approach focused on communities
- Implementation of education and other support services for workers and in some cases their families
- Planned pick-up points in alignment with employment practices
- Implementation of Emergency Response Plan

Conclusions

- Effects on community well-being, infrastructure, services and economy are currently being assessed, and are anticipated to be:
 - Minimal adverse and/or positive
 - Low to moderate magnitude—during construction and operation, and low during reclamation
 - Local—primarily in the Project area
 - Short to medium—based on Project phases
 - Not significant—continuous in frequency, moderate in context, and fully reversible following decommissioning

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Wheeler River Risk Assessment

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To evaluate and understand if people, plants, and animals will be exposed to substances at amounts above what is known to be safe after the planned mitigation measures have been applied.

It incorporates the movement of substances through the food chain as well as direct exposure to substances (soil, air, water, etc.) to appropriately capture risk.

Human Health Risk Assessment

- People who access the project site are considered in the risk assessment. They include:
 - Camp workers
 - Seasonal resident/edge operator—seasonal access
 - People fishing/hunting/trapping/gathering fireweed/picking berries—traditional and recreational access
 - Neighbouring residents fishing/hunting/trapping
 - Future permanent residents—access to Project site after its decommissioning

Assessment Results and Mitigation

- Low overall health risk to people using the area
- Expected radiation doses to people below public dose limit
- Low risk of exposure of people to metals in the environment (below benchmarks for metals)
- Ongoing monitoring during all Project phases

Ecological Risk Assessment

Considers ecological receptors such as:

- Terrestrial Mammals—Woodland Caribou, hare, moose, black bear, lynx, etc.
- Riparian Mammals—Muskrat, mink
- Terrestrial Birds—Bald eagle, robin, Canada goose, etc.
- Riparian Birds—Mallard, loon
- Fish—Northern pike, white sucker
- Aquatic Invertebrates—Zooplankton, benthic invertebrates
- Terrestrial Vegetation—Lichen, Blueberry, Labrador tea
- Aquatic Vegetation—Phytoplankton, Macrophyte

These can be exposed to substances through direct exposure in water, sediment, soil, air or through the food chain.

Assessment Results and Mitigation

- Low overall health risk to animals, plants, and invertebrates
- Expected radiation doses to ecological receptors below benchmarks
- No risk of exposure to ecological receptors to non-radionuclides hazards
- Ongoing monitoring during all Project phases

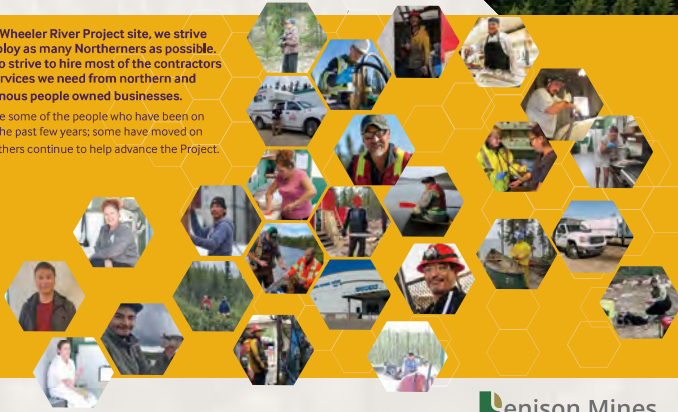
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Wheeler River Project People

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At the Wheeler River Project site, we strive to employ as many Northerners as possible. We also strive to hire most of the contractors and services we need from northern and Indigenous people owned businesses. Here are some of the people who have been on site in the past few years; some have moved on while others continue to help advance the Project.



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Wheeler River Building Relationships

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Denison and the Wheeler River Project team are committed to meaningful engagement with Indigenous people, communities, residents, and organizations with an interest in our Project.

TALKING together. LISTENING to you. RESPONDING to explain.

Engagement With Indigenous and Non-Indigenous Communities of Interest

- English River First Nation
- Kingsley Mills Local 9 (Ponchoal)
- Mills Nation - Saskatchewan
- A La Bale Mills Local 31 (Weila Cross)
- Sydney Mills Local 87 (Beauval)
- Patawaka Mills Local 82 (Patawaka)
- Northern Hamlet of Patawaka
- Northern Village of Pinehouse
- Northern Village of La La Croix
- Northern Village of Beauval

Other communities, organizations and groups of interest:

- Lac la Ponge Indian Band
- Brich Narrows Dene Nation
- Buffalo River Dene Nation
- Hatchet Lake First Nation
- Black Lake First Nation
- Ford du Lac First Nation
- Mills Nation - Saskatchewan
- Yat'ni Nene Land and Resource Office
- Prince Albert Grand Council
- Hudson Lake Tribal Council
- Commercial Trappers
- Commercial loggers
- Cabin and lease owners

Thank You, Bobby John

Bobby John lived, trapped, fished and hunted in the Wheeler River Project area long before Denison and its predecessors started exploring the site. Over the years, Bobby John became someone our Project team relied on for insight on the area, for feedback on the Project proposal, for help with tracking wildlife and for assistance for our field teams, cutting through the bush and more. We will not forget Bobby John's contributions.

Since 2016 and every year after, Denison has met with community members and leadership through workshops, site tours, public meetings, and even virtual community meetings to hear concerns, receive knowledge and input, and share Project information. Subjects of workshops and meetings have included:

- Wheeler River Project components:
 - Access road
 - Treated water left/land discharge location
 - Mining method
 - Design change to freezing containment method
- Environmental considerations:
 - Water bodies - fishing
 - Fish habitat
 - Species at risk
 - Land disturbance

Our Support of Communities

Denison's support of communities can take various forms:

- Donations to community organizations
- Sponsorships of community events
- Sponsorships of in-kind support of education and field trips
- Direct agreements with specific Indigenous communities

Here are some examples of Denison's support in 2021:

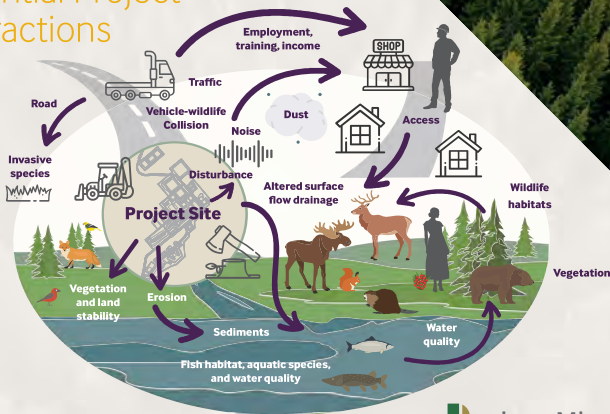
- Entered into an Exploration Agreement with English River First Nation
- Met with Northern Saskatchewan Region 3 South Bay Gathering
- Sponsored Bears Group and their market garden initiative
- Pinehouse Lake hockey tournament
- Improvements to the English River First Nation Culture Camp at the Mawbey Reserve at 160km
- Many Christmas initiatives in the region, including those in Beauval, La La Croix, and the Hamlet of Patawaka

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Information provided as of May, 2022

Wheeler River Potential Project Interactions

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Guidance Materials

To get you started

Environmental Assessments and Licensing can be complicated. This panel has information to help.

Environmental Assessment

- Any new mine will result in changes to the environment. The goal is to understand what these changes could be, and to reduce them as much as possible.
- This is done through an Environmental Assessment.

Mitigation

- Through the Environmental Assessment process, we learn what the effects could be.
- Removing these effects or making them as small as possible is done through Mitigation.
- Examples of mitigation measures include:
 - Recycling and reusing process water to reduce water intake and water discharge
 - Implementing speed limits to reduce wildlife collisions with wildlife.



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Significance

- Applying mitigation measures to planned mining activities reduces or removes effects leaving behind potential remaining effects. Determining how significant these potential remaining effects are is called Significance Determination.
- Significance is determined by:
 - How big the effect is – Magnitude
 - Where the effect occurs – Magnitude + Geographic Extent
 - When the effect occurs – Time
 - How often the effect occurs – Frequency
 - How long the effect lasts – Duration
 - Can the effect be undone – Reversibility
 - Are there any additional environmental or social considerations – Context
- After all of this is assessed, a determination is made about how significant a potential effect would be. Denison must ensure that our new mine will result in no significant adverse effects.

Monitoring

- An important part of the Environmental Assessment process is determining what kind of monitoring is required.
- The purpose of monitoring is to confirm that changes to the environment and land are the same as what was predicted.
- Common mining project monitoring examples include:
 - Surface water testing at new and old locations.
 - Testing and observing wildlife, flora and habitats.
 - Groundwater testing for mining method performance.

Commitments

- As one of the final steps of the Environmental Assessment process, Denison's commitments will be listed which include mitigation, monitoring and other efforts.

Licensing & Permitting

- When the Environmental Assessment for a project is approved, it then moves on to a very important stage referred to as licensing and permitting.
- During this stage, the federal and provincial governments apply relevant legal requirements, standards, and guidelines to the project at a detailed level.
- Commitments may become legal requirements for the project, in addition to applicable requirements applied by the regulators.
- License types include:
 - CNRA License to Prepare Site, License to Construct, and License to Operate. Often these licenses are combined depending on what licensed activities a company aims to include.
 - Ministry of Environment Approval to Construct a Pollutant Control Facility and Approval to Operate a Pollutant Control Facility.
 - For Denison, the two key regulators are the Canadian Nuclear Safety Commission and the Province of Saskatchewan's Ministry of Environment.

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Land and Land Use Activities

Over the years, we have heard that this is important to you.

- What is the long-term impact to the land?
- I will consume the animals from my trapping, but there are fewer around than in the past.
- I fish in the area around Wheeler River.
- I might eat some berries while I am walking around.
- I am concerned about traditional land users and wildlife interruption.

- Will hunters and land users be restricted from accessing the area?
- Our ancestors have lived on our Traditional Territory since time immemorial.
- There are cultural sites and artifacts left throughout the region.

Environmental Assessment

We understand the importance of Land and Land Use in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Taking measures to protect plants, fish, and wildlife.
 - Treating water to regulatory standards to protect aquatic life.
 - Limiting the Project footprint and using areas that have already been cleared.
 - Reducing dust and air emissions and using noise reducing equipment.
 - Reclaiming disturbed areas on an ongoing basis.
 - Establishing Trappers' compensation and various agreements.
 - Assessing areas prior to construction for cultural sites and artifacts.

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Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Surface Water and Groundwater.**

Monitoring

- Main monitoring activities to be undertaken:
 - Wildlife populations studies
 - Bird surveys
 - Fish populations surveys
 - Vegetation sampling and testing

Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a single format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to land and land use will be contained within licenses and permits once received.

Denison will ensure requirements related to land and land use are met through implementation of programs, plans, procedures etc. Some examples include:

- Effluent and Emissions Monitoring Plan
- Groundwater Protection and Monitoring Plan
- Biodiversity Management Plan
- Waste Management Plan



Surface Water and Groundwater

Over the years, we have heard that this is important to you.

- All animals are affected by water quality.
- What happens with groundwater monitoring once the mining is done and the freeze well comes out?
- Will you be treating the discharged water?
- I swim in many different lakes.
- Will the freeze well affect groundwater?

- How will you protect the water quality?
- What happens when the freeze well melts? Will there be monitoring of groundwater during this?
- Is there any chance of the wells blowing and contaminating the ground around it?

Environmental Assessment

We understand the importance of Surface Water and Groundwater in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Reducing freshwater intake and release to Whitefish Lake.
 - Water treatment in place before release of treated effluent.
 - Recycling contact water for use as process water.
 - Recycling process water for re-use.
 - Establishing a monitoring system for wells and pipelines.
 - Designing pipelines to have a second barrier to minimize spills to the environment.
 - Crossing the freeze well before mining operations as a third level of containment to prevent mining solution from entering into surrounding groundwater.

Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Surface Water and Groundwater.**

Monitoring

- Main monitoring activities to be undertaken:
 - Water testing prior to release to the lake
 - Air testing
 - Groundwater sampling and testing

Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a single format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Province of Saskatchewan will regulate project activities through an Approval to Operate. Conditions related to surface water and groundwater stewardship will be contained within licenses once received.

- Denison will ensure requirements related to surface water and groundwater are met through implementation of programs, plans, procedures etc. Some examples include:
 - Waste Management Plan
 - Effluent and Emissions Monitoring Plan
 - Groundwater Protection and Monitoring Plan
 - Environmental Code of Practice



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Wildlife

Over the years, we have heard that this is important to you.

- Moose is what is in my freezer. Will the Project interrupt harvesting moose? Will I still be able to safely eat moose that I harvest?
- Will construction and operation harm moose and caribou populations?

- A lot of people live off that land, will the Project damage the animals?
- Would the chemicals being transported possibly harm wildlife?

Environmental Assessment

We understand the importance of Wildlife in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Limiting the Project footprint and using areas that have already been cleared.
 - Providing wildlife education and awareness training to staff.
 - Recording wildlife observations.
 - Ongoing reclamation of disturbed areas.
 - Surveying for habitat before clearing vegetation.
 - Working as quiet as possible, and avoiding clearing vegetation during denning and calving periods.
 - Putting up speed limit signs and wildlife crossing signs on Project roads.

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Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Wildlife.**

Monitoring

- Main monitoring activities to be undertaken:
 - Wildlife populations studies and testing
 - Bird surveys and testing
 - Fish populations surveys and testing
 - Vegetation sampling and testing



Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a single format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to wildlife stewardship will be contained within licenses once received.

Denison will ensure requirements related to wildlife are met through implementation of programs, plans, procedures, etc. Some examples include:

- Environmental Monitoring Plan
- Biodiversity Management Plan
- Waste Management Program
- Facility and Equipment Management Program



Business and Work Opportunities

Over the years, we have heard that this is important to you.

- Seasonal workers need more opportunities. This will show us that you care.
- What are the economic opportunities? A new and smaller scale mining method can reduce jobs for the community. We need to learn about this kind of mining.
- What is your plan for training and for young people?
- For this new mining method, are there different types of jobs we should train for?

- We have been promised jobs in the past, but those promises were not kept. I'd like to see this change.
- Will you give site specific training, or training that is transferable?
- When the mine eventually closes a lot of people are going to lose jobs.
- What kind of employment opportunities will we see with Denison?

Environmental Assessment

We understand the importance of Business and Work Opportunities in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Prioritizing buying goods and services for the Project from local communities and communities in Northern Saskatchewan.
 - Prioritizing the hiring and training of local residents.
 - Establishing Trappers' compensation and various agreements.



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Significance

We have determined that there will be **No Significant Adverse Impacts on Business and Work Opportunities.** Local Northern Saskatchewan communities are expected to experience positive effects.

Monitoring

- Main monitoring activities to be undertaken:
 - Reporting on employment and business efforts

Commitments

Mitigation, monitoring, and other efforts are commitments that we have made. These will be outlined in a simple format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to business and work opportunities will be contained within licenses once received.

- Denison will ensure requirements related to business and work opportunities are met through implementation of programs, plans, procedures, etc. Some examples include:
 - Human Performance Program (Human Resource Development Plan)
 - Training Management Program
 - Surface Lease Agreement



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Commitments

Commitments are related to mitigation, monitoring, and various other efforts. A comprehensive list of Denison's commitments will be provided to regulatory bodies, after which they can become part of licensing. Some examples of commitments are listed below.



- Develop a Draft Caribou Management Plan with the Ministry of Environment.
- Survey before disturbance to inform species-specific mitigation.
- Monitoring to ensure engineering designs are being met.
- Wellfield surface pipes will have secondary containment and a leak detection system.
- In ground mining solution and UBS will have three layers of protection.

- Liners (such as those used for the industrial wastewater treatment plant precipitate pond, hazardous waste storage pond, and effluent monitoring and release ponds) will be designed based on materials being stored. Performance monitoring will be in place.
- Above ground, double walled, fuel storage tanks.
- Adjusting and developing mitigation measures as needed, as part of an adaptive management process.

- Hazardous substances managed appropriately: Procedures for spill management, handling, and cleanup located in accessible location.
- Fresh water wells and surface water intake specifics developed according to best practice and applicable standards.
- Treated effluent discharge adhere to approvals and regulations to protect wildlife and water.
- Speed limits to reduce dust and protect wildlife.

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From: [Carolanne Inglis-McQuay](#)
To: [Ty Roberts](#)
Cc: [REDACTED]
Subject: Denison Follow Up to Meeting on August 30, 2023
Date: Saturday, November 4, 2023 6:27:00 AM
Attachments: [20231106-LTR-DEN LLRIB-DEN ResponseToMeeting.pdf](#)

Dear Ty:

Please find attached correspondence from Denison regarding our meeting on August 30, 2023 in respect of the Wheeler River Project, and a response to Lac La Ronge Indian Band's comments made to the Canadian Nuclear Safety Commission on the Project.

Ty, I will keep following up with you regarding the contribution to the Heritage Fund noted in the letter.

Have a great day,
Carolanne

Carolanne Inglis-McQuay

Director, Corporate Social Responsibility

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

345 4th Avenue South

Saskatoon, SK, Canada, S7K 1N3



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From: [Carolanne Inglis-McQuay](#)
To: [Cheyenna Hunt](#); [Robin Kusch](#)
Cc: [Janna Switzer](#)
Subject: Denison Response to ERFN Technical Comments
Date: Wednesday, November 1, 2023 7:48:00 AM
Attachments: [20231101-Denison Response to ERFN Main Areas of Concern.pdf](#)
Importance: High

Good morning:

On behalf of Denison, please find attached a comprehensive technical memo prepared by the Denison team in response to the July 26, 2023 document from English River First Nation summarizing the main areas of concern in relation to the Wheeler River Project.

Following your review, if you would like us to coordinate a meeting to discuss further, we would be happy to arrange. I will touch base with you in the coming week to discuss if you anticipate any further steps being required.

Thank you for your continued efforts in this regard.

Very sincerely,
Carolanne

Carolanne Inglis-McQuay

Director, Corporate Social Responsibility

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



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From: [Robin Kusch](#)
To: [Carolanne Inglis-McQuay](#); [Cheyenna Hunt](#)
Cc: [Janna Switzer](#)
Subject: [**]Re: Denison Response to ERFN Technical Comments
Date: Tuesday, November 28, 2023 10:34:48 PM
Attachments: [Review Denison Response ERFN Main Areas of Concern.pdf](#)

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

Good day Carolanne,

Please find attached the review summary of Denison's Response to ERFN's main areas of Concern, which I have provided to ERFN. As you will see in the summary, I am satisfied with the level of response provided at this stage of project planning. They asked that I PDF the review and send it to Denison.

Thank you,
Robin Kusch

From: [Walter Smith](#)
To: [Carolanne Inglis-McQuay](#)
Subject: [**]Re: Thank you for including us in the meeting today
Date: Tuesday, December 5, 2023 2:28:51 PM

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Yes that is what we are saying.
Sent from my iPhone

On Dec 5, 2023, at 2:17 PM, Carolanne Inglis-McQuay
<cinglismcquay@denisonmines.com> wrote:

Walter, Damien:

Thank you for going above and beyond to include us in the meeting today with the CNSC. It is affirming to hear and understand from your perspective that we have been working well together, on the same journey, and that you think this is part of the natural positive evolution for the community. To me, that is the most powerful thing to be proud of.

I know you said it in the meeting to the CNSC, but if, at this point, you feel that our recent correspondence to you has resolved your concerns to date with the draft EIS and the Wheeler River Project, it could be helpful to let me know by email so I can confirm that to the regulators.

Many thanks again. I am sorry I will miss tomorrow night. It is my favourite event of the season!

Have fun celebrating all those amazing Pinehouse people.

Carolanne

Carolanne Inglis-McQuay
Director, Corporate Social Responsibility

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

<image001.jpg>

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Wheeler River VCs: Ground, Terrain and Soil

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Environmental Assessment Considerations

- Land stability
- Soil quantity, quality and nutrients

Potential Effects

- Activities that could impact land stability, surface drainage patterns, surface erosion potential, soil quality, and soil quantity:
 - Clearing, grading, and construction
 - Unexpected spills, leaks
 - Release of water to groundwater and/or surface water bodies

Reclamation of disturbed areas may result in similar Project-related effects, but to a lesser extent.

Mitigation Measures

- Limit the area of disturbance
- Construction strategies to eliminate or reduce impacts
- Use of existing clearings and previously disturbed land
- Reusing disturbed sources of soil nutrients, generated during construction, for the reclamation process
- Installation of sediment/erosion controls and surface water management features
- Monitoring of open-source dust associated with major earthworks and equipment travel
- Fuel Management and Spill Control Plan in place to respond to unexpected leaks, spills, and releases of materials
- Wherever possible, progressive reclamation will be conducted throughout the life of the Project in relation to landscape features (slope, aspect) and surface drainage patterns

Conclusions

- Effects are anticipated to be:
 - Low magnitude—within range of natural variations
 - Local—limited to areas disturbed by the project
 - Medium term—up to, but not including post-decommissioning
 - Not significant—residual effects are not expected to alter VCs integrity and sustainability nor their availability to contribute to the environment

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Information provided as of May, 2022

Wheeler River VCs: Wildlife and Birds

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Environmental Assessment Considerations

- Populations and health of wildlife including:
 - Ungulates: Moose, Woodland Caribou
 - Furbearers: Wolverine, Mink, Muskrat
 - Birds: Bald Eagle, Osprey, Common Nighthawk, Short-Eared Owl, Watersnipe, Game Birds, Songbirds, Yellow Rail, Rusty Blackbird, Olive-Sided Flycatcher

Potential Effects

- Activities that could reduce or disturb species of wildlife, birds, or habitats include:
 - Vehicles, equipment, and aircraft traffic
 - Dust
 - Human presence
 - Collisions with equipment and vehicles
 - Entrapment in facilities
 - Exposure to substances in dust
 - Release of Project-related treated effluent
 - Spills of hazardous materials
 - More efficient hunter, trapper, and predator access to the Project area via new access routes
- Changes to surface water quality could affect wildlife habitat and health from water management practices.
- Decommissioning of Project site may result in a continued alteration of wildlife habitat and/or mortality from vehicle-wildlife collisions.

Mitigation Measures – Wildlife Management Plan

- Limit the area of disturbance
- Use of existing clearings and previously disturbed land
- Site clearing scheduled to avoid times when animal and birds are denning, raising, breeding
- Nesting surveys conducted before clearing to identify and establish measures to protect dens, burrows, lodges, nests, and other habitat
- Measure and practices to reduce the generation of dust
- Secondary containment of tanks and pipelines to contain accidental leaks and spills
- Implementation of Fuel Management and Spill Control Plan
- Fencing and monitoring contaminated areas—waste ponds and pools, landfill
- Implementation of Woodland Caribou Management Plan
- Employees trained to minimize their impact on wildlife, such as no littering, respect for wildlife, etc.
- Implementation of speed limits to reduce risk of collisions with wildlife
- Waste and hazardous materials collected and temporarily stored in wildlife-proof containers

Conclusions

- Effects are anticipated to be:
 - Low magnitude—risk of mortality within range of natural variations
 - Regional effect on habitat loss—limited to Project area
 - Local effect on mortality—direct mortality within Project area from vehicle-wildlife collisions, but indirect mortality could extend beyond Project area
 - Medium term for long-term—highest loss of habitat and mortality vehicle-wildlife collisions expected during construction and operation, but may continue during other phases of the project
 - Medium to long term for furbearers, raptors and select bird species—loss of habitat and mortality vehicle-wildlife collisions expected during construction and operation
 - Long term—residual effects not expected to alter habitat integrity nor wildlife and bird regional populations sustainability

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Wheeler River VC: Aquatic Environment

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Environmental Assessment Considerations

- Fish habitat availability and distribution
- Fish survival and reproduction
- Surface water levels and flow
- Concentration of chemicals and metals in surface water
- Concentration of chemical and metals in aquatic sediments
- Distribution and survival of snails, worms, dragonfly larvae, and other benthic invertebrates

Potential Effects

- Activities that could reduce or disturb aquatic environments, species, or habitats:
 - Modification of fish habitat from disturbances around surface water
 - Erosion and transport of sediments into surface water
 - Water withdrawal from Whitefish Lake
 - Releasing effluent to Whitefish Lake
 - Water management could result in changes to water quality affecting fish, fish habitat, and benthic invertebrates
 - Water management could alter stream flow or lake levels required for fish mobility and productivity
 - Reclamation of disturbed areas could increase sediments in water and change fish habitat

Mitigation Measures

- Limiting duration of in-water work (conducting work during low-flow periods, and conducting work away from flows when possible)
- Avoiding activities in windy or rainy conditions to limit erosion and sedimentation
- Plan activities in waterbodies to limit loss or disturbance to aquatic and sensitive habitat
- Limit shoreline degradation when operating machinery
- Stabilize shorelines with native species, wherever possible
- Maintaining routes used for fish passage by designing water intake and treated water discharge locations to protect fish, fish movements, and fish habitats
- Planning to avoid chemicals entering waterways during near-water work
- Implementing an Erosion and Sediment Control Plan

Conclusions

- Effects are anticipated to be:
 - Low magnitude—no loss of habitat and fish population
 - Local—limited to Project area
 - Long term for habitat availability—throughout construction and operation
 - Short term for habitat distribution—fish movement protected throughout life of the project
 - Not significant—residual effects not expected to alter local fish populations

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Wheeler River VC: Relationship to the Land

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Environmental Assessment Considerations

- Resources availability
- Land availability
- Suitability of land and resources

Potential Effects

- The presence of the project and its activities may result in changes to:
 - Water, vegetation, fish, and wildlife
 - Access to the area
 - Land area available
 - Noise level, traffic, dust, and other disturbances associated with Project activities
 - Quality of the experience using resources
 - Opportunities for Indigenous land use activities
 - Opportunities for non-Indigenous land use

Mitigation Measures

- Implementation of measures to protect plants, fish, and wildlife
- Limit the area of disturbance
- Use of noise reducing equipment
- Reduce dust and air emissions
- Enforce speed limits for traffic
- Implement radiological clearance of equipment before exiting Project site
- Implement progressive reclamation of disturbed areas
- Establish community agreements
- Establish trappers' compensation
- Implement Indigenous People's Policy, including ongoing communication with Indigenous Communities of Interest

Conclusions

- Effects are anticipated to be:
 - Low magnitude—no loss of habitat and fish population
 - Local—Project area (in and around the local and regional study area)
 - Complete—until reclamation is complete
 - Not significant—continuous in frequency, low in impact, and fully reversible following decommissioning

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Wheeler River VCs: Community, Culture and Economy

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Environmental Assessment Considerations

- Populations, traffic, community infrastructure and services
- Income, employment, training, government revenues, business opportunities
- Community cohesion and traditional economy
- Employment and training (generally delivered through institutions connected to northern Saskatchewan)

Potential Effects

- Activities that could interact with community, culture, and economy:
 - Population numbers and population characteristics
 - Up to 300 jobs created during construction and more than 100 direct and contract roles during the operation phase
 - Supervisory, trades, professional, technical, and foundational (entry level) positions available during operations
 - Availability and increased opportunities for business and training
 - Participation in traditional economic activities
 - Abscendence of Traffic
 - Increased demand on community infrastructure and services

Mitigation Measures

- Implementation of agreements with communities (support)
- Prioritize Indigenous and non-Indigenous Communities of Interest (employment, training, and business, wherever possible)
- Implement procurement approach focused on communities
- Implementation of education and other support services for workers and in some cases their families
- Planned pick-up points in alignment with employment practices
- Implementation of Emergency Response Plan

Conclusions

- Effects on community well-being, infrastructure, services and economy are currently being assessed, and are anticipated to be:
 - Minimal adverse and/or positive
 - Low to moderate magnitude—during construction and operation, and low during reclamation
 - Local—primarily in the Project area
 - Short to medium—based on Project phases
 - Not significant—continuous in frequency, moderate in context, and fully reversible following decommissioning

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Wheeler River Risk Assessment

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To evaluate and understand if people, plants, and animals will be exposed to substances at amounts above what is known to be safe after the planned mitigation measures have been applied.

It incorporates the movement of substances through the food chain as well as direct exposure to substances (soil, air, water, etc.) to appropriately capture risk.

Human Health Risk Assessment

People who access the project site are considered in the risk assessment. They include:

- Camp workers
- Seasonal resident/edge operator—seasonal access
- People fishing/hunting/trapping/gathering fireweed/picking berries—traditional and recreational access
- Neighbouring residents fishing/hunting/trapping
- Future permanent residents—access to Project site after its decommissioning

Assessment Results and Mitigation

- Low overall health risk to people using the area
- Expected radiation doses to people below public dose limit
- Low risk of exposure of people to metals in the environment (below benchmarks for metals)
- Ongoing monitoring during all Project phases

Ecological Risk Assessment

Considers ecological receptors such as:

- Terrestrial Mammals—Woodland Caribou, hare, moose, black bear, lynx, etc.
- Riparian Mammals—Muskrat, mink
- Terrestrial Birds—Bald eagle, robin, Canada goose, etc.
- Riparian Birds—Mallard, loon
- Fish—Northern pike, white sucker
- Aquatic Invertebrates—Zooplankton, benthic invertebrates
- Terrestrial Vegetation—Lichen, Blueberry, Labrador tea
- Aquatic Vegetation—Phytoplankton, Macrophyte

These can be exposed to substances through direct exposure in water, sediment, soil, air or through the food chain.

Assessment Results and Mitigation

- Low overall health risk to animals, plants, and invertebrates
- Expected radiation doses to ecological receptors below benchmarks
- No risk of exposure to ecological receptors to non-radionuclides hazards
- Ongoing monitoring during all Project phases

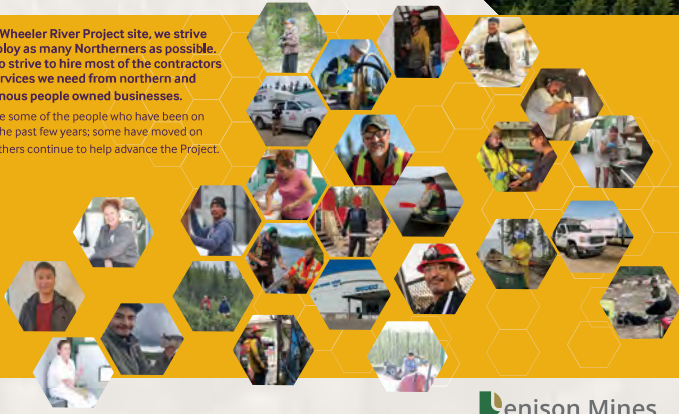
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Wheeler River Project People

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At the Wheeler River Project site, we strive to employ as many Northerners as possible. We also strive to hire most of the contractors and services we need from northern and Indigenous people owned businesses. Here are some of the people who have been on site in the past few years; some have moved on while others continue to help advance the Project.



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Wheeler River Building Relationships

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Denison and the Wheeler River Project team are committed to meaningful engagement with Indigenous people, communities, residents, and organizations with an interest in our Project.

TALKING together. LISTENING to you. RESPONDING to explain.

Engagement With Indigenous and Non-Indigenous Communities of Interest

- English River First Nation
- Kingsley Mills Local 30 (Saskatchewan)
- Missis Naton - Saskatchewan
- A La Bale Mills Local 31 (We la Croix)
- Siponik Mills Local 37 (Beauval)
- Patawaka Mills Local 82 (Patawaka)
- Northern Hamlet of Patawaka
- Northern Village of Pinehouse
- Northern Village of La la Croix
- Northern Village of Beauval

Other communities, organizations and groups of interest:

- Lac la Ponge Indian Band
- Brich Narrows Dene Nation
- Buffalo River Dene Nation
- Hatchet Lake First Nation
- Black Lake First Nation
- Ford du Lac First Nation
- Maris Nation - Saskatchewan
- Yat'yé Néné Land and Resource Office
- Prince Albert Grand Council
- Hudson Lake Tribal Council
- Commercial Trappers
- Commercial Fishers
- Commercial Lodgers
- Cabin and lease owners

Thank You, Bobby John

Bobby John lived, trapped, fished and hunted in the Wheeler River Project area long before Denison and its predecessors started exploring the site. Over the years, Bobby John became someone our Project team relied on for insight on the area, for feedback on the Project proposal, for help with tracking wildlife and for assistance for our field teams, cutting through the bush and more. We will not forget Bobby John's contributions.

Since 2016 and every year after, Denison has met with community members and leadership through workshops, site tours, public meetings, and even virtual community meetings to hear concerns, receive knowledge and input, and share Project information. Subjects of workshops and meetings have included:

- Wheeler River Project components:
 - Access road
 - Treated water left/land discharge location
 - Mining method
 - Design change to freezing containment method
- Environmental considerations:
 - Water bodies - fishing
 - Fish habitat
 - Species at risk
 - Land disturbance

Our Support of Communities

Denison's support of communities can take various forms:

- Donations to community organizations
- Sponsorships of community events
- Sponsorships of in-kind support of education and field trips
- Direct agreements with specific Indigenous communities

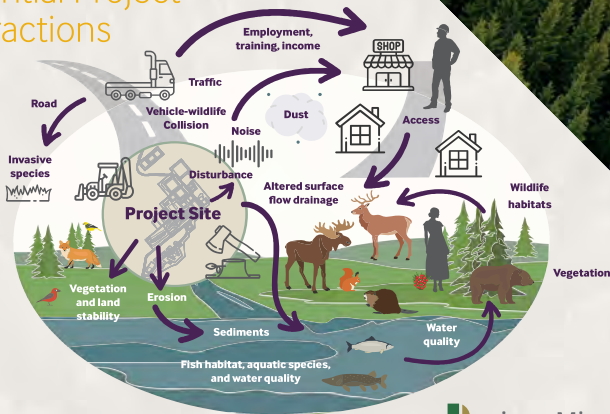
Here are some examples of Denison's support in 2021:

- Entered into an Exploration Agreement with English River First Nation
- Metis Nation Saskatchewan Region 3 South Bay Gathering
- Saskatchewan Group and their market garden initiative
- Pinehouse Lake hockey tournament
- Improvements to the English River First Nation Culture Camp at the Mawbey Reserve at 160km
- Many Christmas initiatives in the region, including those in Beauval, La la Croix, and the Hamlet of Patawaka

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Information provided as of May, 2022

Wheeler River Potential Project Interactions

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Guidance Materials

To get you started

Environmental Assessments and Licensing can be complicated. This panel has information to help.

Environmental Assessment

- Any new mine will result in changes to the environment. The goal is to understand what these changes could be, and to reduce them as much as possible.
- This is done through an Environmental Assessment.

Mitigation

- Through the Environmental Assessment process, we learn what the effects could be.
- Removing these effects or making them as small as possible is done through Mitigation.
- Examples of mitigation measures include:
 - Recycling and reusing process water to reduce water intake and water discharge
 - Implementing speed limits to reduce wildlife collisions with wildlife.



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Significance

- Applying mitigation measures to planned mining activities reduces or removes effects leaving behind potential remaining effects. Determining how significant these potential remaining effects are is called Significance Determination.
- Significance is determined by:
 - How big the effects are – Magnitude
 - Where the effect occurs – Magnitude + Geographic Extent
 - When the effect occurs – Time
 - How often the effect occurs – Frequency
 - How long the effect lasts – Duration
 - Can the effect be undone – Reversibility
 - Are there any additional environmental or social considerations – Context
- After all of this is assessed, a determination is made about how significant a potential effect would be. Denison must ensure that our new mine will result in no significant adverse effects.

Monitoring

- An important part of the Environmental Assessment process is determining what kind of monitoring is required.
- The purpose of monitoring is to confirm that changes to the environment and land are the same as what was predicted.
- Common mining project monitoring examples include:
 - Surface water testing at new and old locations.
 - Testing and observing wildlife, flora and habitats.
 - Groundwater testing for mining method performance.

Commitments

- As one of the final steps of the Environmental Assessment process, Denison's commitments will be listed which include mitigation, monitoring and other efforts.

Licensing & Permitting

- When the Environmental Assessment for a project is approved, it then moves on to a very important stage referred to as licensing and permitting.
- During this stage, the federal and provincial governments apply relevant legal requirements, standards, and guidelines to the project at a detailed level.
- Commitments may become legal requirements for the project, in addition to applicable requirements applied by the regulators.
- License types include:
 - CNRA License to Prepare Site, License to Construct, and License to Operate. Often these licenses are combined depending on what licensed activities a company aims to include.
 - Ministry of Environment Approval to Construct a Pollutant Control Facility and Approval to Operate a Pollutant Control Facility.
 - For Denison, the two key regulators are the Canadian Nuclear Safety Commission and the Province of Saskatchewan's Ministry of Environment.

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Land and Land Use Activities

Over the years, we have heard that this is important to you.

- What is the long-term impact to the land?
- I will consume the animals from my trapping, but there are fewer around than in the past.
- I fish in the area around Wheeler River.
- I might eat some berries while I am walking around.
- I am concerned about traditional land users and wildlife interruption.
- Will hunters and land users be restricted from accessing the area?
- Our ancestors have lived on our Traditional Territory since time immemorial.
- There are cultural sites and artifacts left throughout the region.

Environmental Assessment

We understand the importance of Land and Land Use in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Taking measures to protect plants, fish, and wildlife.
 - Treating water to regulatory standards to protect aquatic life.
 - Limiting the Project footprint and using areas that have already been cleared.
 - Reducing dust and air emissions and using noise reducing equipment.
 - Reclaiming disturbed areas on an ongoing basis.
 - Establishing Trappers' compensation and various agreements.
 - Assessing areas prior to construction for cultural sites and artifacts.

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Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Surface Water and Groundwater.**

Monitoring

- Main monitoring activities to be undertaken:
 - Wildlife populations studies
 - Bird surveys
 - Fish populations surveys
 - Vegetation sampling and testing

Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a single format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to land and land use will be contained within licenses and permits once received.

Denison will ensure requirements related to land and land use are met through implementation of programs, plans, procedures etc. Some examples include:

- Effluent and Emissions Monitoring Plan
- Groundwater Protection and Monitoring Plan
- Biodiversity Management Plan
- Waste Management Plan



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Surface Water and Groundwater

Over the years, we have heard that this is important to you.

- All animals are affected by water quality.
- What happens with groundwater monitoring once the mining is done and the freeze wall comes out?
- Will you be treating the discharged water?
- I swim in many different lakes.
- Will the freeze wall affect groundwater?
- How will you protect the water quality?
- What happens when the freeze wall melts? Will there be monitoring of groundwater during this?
- Is there any chance of the wells blowing and contaminating the ground around it?

Environmental Assessment

We understand the importance of Surface Water and Groundwater in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Reducing freshwater intake and release to Whitefish Lake.
 - Water treatment in place before release of treated effluent.
 - Recycling contact water for use as process water.
 - Recycling process water for re-use.
 - Establishing a monitoring system for wells and pipelines.
 - Designing pipelines to have a second barrier to minimize spills to the environment.
 - Crossing the freeze wall before mining operations as a third level of containment to prevent mining solution from entering into surrounding groundwater.

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Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Surface Water and Groundwater.**

Monitoring

- Main monitoring activities to be undertaken:
 - Water testing prior to release to the lake
 - Air testing
 - Groundwater sampling and testing

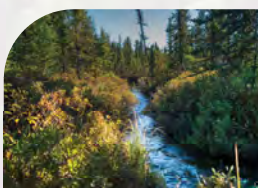
Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a single format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Province of Saskatchewan will regulate project activities through an Approval to Operate. Conditions related to surface water and groundwater stewardship will be contained within licenses once received.

- Denison will ensure requirements related to surface water and groundwater are met through implementation of programs, plans, procedures etc. Some examples include:
 - Waste Management Plan
 - Effluent and Emissions Monitoring Plan
 - Groundwater Protection and Monitoring Plan
 - Environmental Code of Practice



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Wildlife

Over the years, we have heard that this is important to you.

- Moose is what is in my freezer. Will the Project interrupt harvesting moose? Will I still be able to safely eat moose that I harvest?
- Will construction and operation harm moose and caribou populations?
- A lot of people live off that land, will the Project damage the animals?
- Possibly the chemicals being transported would harm wildlife?

Environmental Assessment

We understand the importance of Wildlife in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Limiting the Project footprint and using areas that have already been cleared.
 - Providing wildlife education and awareness training to staff.
 - Recording wildlife observations.
 - Ongoing reclamation of disturbed areas.
 - Surveying for habitat before clearing vegetation.
 - Working as quiet as possible, and avoiding clearing vegetation during denning and calving periods.
 - Putting up speed limit signs and wildlife crossing signs on Project roads.

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Significance

The Environmental Assessment has determined that there will be **No Significant Adverse Impacts on Wildlife.**

Monitoring

- Main monitoring activities to be undertaken:
 - Wildlife populations studies and testing
 - Bird surveys and testing
 - Fish populations surveys and testing
 - Vegetation sampling and testing



Commitments

Mitigation, monitoring, and other efforts are commitments Denison has made. These will be outlined in a single format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to wildlife stewardship will be contained within licenses once received.

Denison will ensure requirements related to wildlife are met through implementation of programs, plans, procedures, etc. Some examples include:

- Environmental Monitoring Plan
- Biodiversity Management Plan
- Waste Management Program
- Facility and Equipment Management Program



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Business and Work Opportunities

Over the years, we have heard that this is important to you.

- Seasonal workers need more opportunities. This will show us that you care.
- What are the economic opportunities? A new and smaller scale mining method can reduce jobs for the community. We need to learn about this kind of mining.
- What is your plan for training and for young people?
- For this new mining method, are there different types of jobs we should train for?
- We have been promised jobs in the past, but those promises were not kept. I'd like to see this change.
- Will you give site specific training, or training that is transferable?
- When the mine eventually closes a lot of people are going to lose jobs.
- What kind of employment opportunities will we see with Denison?

Environmental Assessment

We understand the importance of Business and Work Opportunities in Northern Saskatchewan; it's one of the reasons we completed an Environmental Assessment on the potential effects.

Mitigation

- Some key mitigation measures to manage and control the potential effects before and during operations include:
 - Prioritizing buying goods and services for the Project from local communities and communities in Northern Saskatchewan.
 - Prioritizing the hiring and training of local residents.
 - Establishing Trappers' compensation and various agreements.



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Significance

We have determined that there will be **No Significant Adverse Impacts on Business and Work Opportunities.** Local Northern Saskatchewan communities are expected to experience positive effects.

Monitoring

- Main monitoring activities to be undertaken:
 - Reporting on employment and business efforts

Commitments

Mitigation, monitoring, and other efforts are commitments that we have made. These will be outlined in a single format for the regulators. Commitments then can become part of licensing.

Licensing and Permitting

The Canadian Nuclear Safety Commission will regulate project activities through an issued license. The Saskatchewan Ministry of Environment will regulate project activities through an Approval to Operate. Conditions related to business and work opportunities will be contained within licenses once received.

- Denison will ensure requirements related to business and work opportunities are met through implementation of programs, plans, procedures, etc. Some examples include:
 - Human Performance Program (Human Resource Development Plan)
 - Training Management Program
 - Surface Lease Agreement



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Commitments

Commitments are related to mitigation, monitoring, and various other efforts. A comprehensive list of Denison's commitments will be provided to regulatory bodies, after which they can become part of licensing. Some examples of commitments are listed below.



- Develop a Draft Caribou Management Plan with the Ministry of Environment.
- Survey before disturbance to inform species-specific mitigation.
- Monitoring to ensure engineering designs are being met.
- Wellfield surface pipes will have secondary containment and a leak detection system.
- In ground mining solution and UBS will have three layers of protection.

- Liners (such as those used for the industrial wastewater treatment plant precipitate pond, hazardous waste storage pond, and effluent monitoring and release ponds) will be designed based on materials being stored. Performance monitoring will be in place.
- Above ground, double walled, fuel storage tanks.
- Adjusting and developing mitigation measures as needed, as part of an adaptive management process.

- Hazardous substances managed appropriately: Procedures for spill management, handling, and cleanup located in accessible location.
- Fresh water wells and surface water intake specifics developed according to best practice and applicable standards.
- Treated effluent discharge adhere to approvals and regulations to protect wildlife and water.
- Speed limits to reduce dust and protect wildlife.

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Wheeler River Project – Denison Mines

mâci masinahamihk okâwiymâw askiy mêskopicikêwin wihtamasinahkan kâ-wî-itôtamihk atoskêwin

anima Wheeler River atoskêwin(anima atoskêwin) anima Denison itascikêwin êkota situ miskêwin (ISR) kaskatêw asiniy wâtihkêwin êkwa osihcikêwin misi-wikamik:

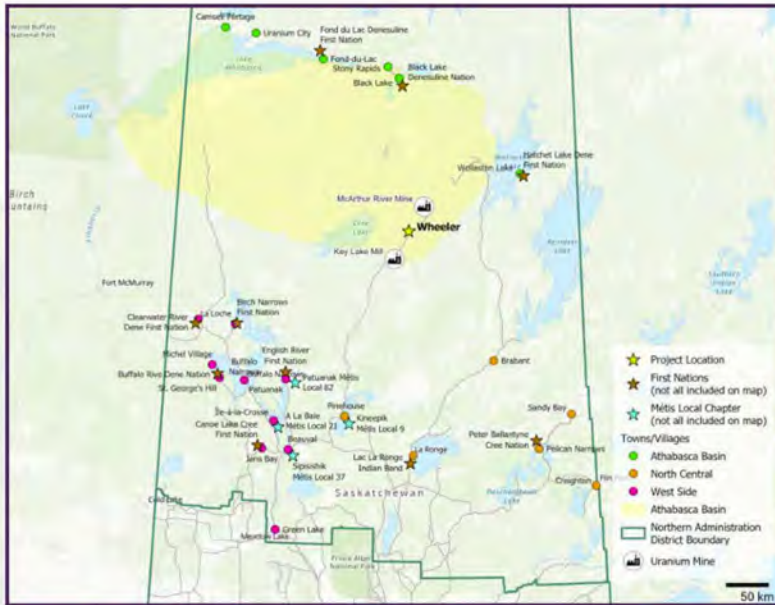
- tânitê: kîwîtinohk Saskatchewan, kanâta
- atoskêwin kîkwaya êkwa itôtamowina: anima tâwayihk atoskêwin kîkwaya anihi ISR wâtihkêwin êkwa anima osihcikêwin misi-wikamik. sihtoskamihk misi-atoskêwin kîkwaya êkwa itôtamowina astêwa kîkwaya osci wêpinikêwina, nipiy pimipayicikana, wâskwatawêpicikana, êkwa pimitâpâsowin, tâskoc tôhêwina, sâkahikanisa, wikamikwa, mêskanawa, êkwa pimihaakan mêskanaw.
- pihcâyihk: kanâtahk nipiy, nanâtohk âpoya (osci wâtihkêwin, kaskatêw asiniy osihcikêwin, nipiy kanâcihcikêwin), wâskwatawêwin êkwa pimi.
- wayawê itôtamowina: wêpinikêwin (askiwiya, kanâti asiniy wêpinikêwina, pîtosî wêpinikêwin asiniy (wâtihkêwin askiy), cîki wêpinikêwin, misi wêpinikêwin, sâpipêwina ohci osihcikêwin wikamik êkwa nipiy kanâcihcikêwin, mîsêw âpoy) îhîwina mîna pêwâpisk kaskâpahtêwina (GHGs) kisêwêwin, êkwa kanâcihtâhk nipiy kâ-sîkipitamihk nipîhk.
- kîkway osihtâhk: U3O8 ahpô osâwi-wîhkikasikan. anima kîkway Denison atâwâkêcik apacihcikâtêw isi pimi êkota kaskatêw asiniy wikamikohk, sihtoskamihk okâwiymâw askiy itôtamowin ka-nîkipitamihk GHG kaskâpahtêwina.
- atoskêwin: nântaw 300 atoskêwiyniwak kâ-osihcâtêk êkwa 180 ikospê atoskêwin. anima pimipayicikêwin ka-pihci-pimihaak êkwa wayawê-pimihaak atoskêwin.
- atoskêwin ispayik, 5 askiy osci pônihkamihk, êkwa 15 askiya osci kîsihtâhki-pônihkamihk ispayihowina.

anima okâwiymâw askiy kinwâpahcikêwin (EA) kâ-masinahikâtêk ôta okâwiymâw askiy mêskopicitamihk wihtamâkêwin (EIS) kinwâpahcikâtêw êkwa nanisihkâc, askôhamihk itôtamowin ka-kinwâpahtamihk atoskêwina tâskoc mêskocipayinwa. Kakwê osihtâhk kanawêyicikêwin EA masinahamihk, ahpô ayiwâk pihci, anima nistohtamowin misi-atoskêwin osihcikêwina. Tâskoc, anima tipêyaw nakatamowin osci osihcikêwak masinahikêwina nântaw 75 ha, mâka anima EIS itêhtamwak anima atoskêwin mêskocipayiwin cîki 170 ha. pêyakwan, tahto askiy osihcikêwin osci osihcikêwak osihtâwin anima 6 Mlbs U3O8 tahto askiy iskohk 10 askiya, mâka EIS itêhtamwak osihtâwin 9 Mlbs U3O8 tahto askiy isi 15 askiya, mîna mistahi itôtamowin iskohk 12 Mlbs U3O8 askiy osci itôtamowin waskawêwin. Itastêw, tâskoc, anima EIS kinwâpahtamwak pihcâyihk nitawêhtamihk êkwa wayawêwina osihtâhk tahtwâ askiy 50% ayiwâk kâ-itêhtamihk.

kîkwaya kâ-astêki kâ-kîsi kanâcihtâhk ikospê pihtaw osci askiy ê-kîskatahikâtêk, ayiwâk ayisîniwak ê-pimitâpâsocik, kaskâpahtêw, wêpinikêwina, êkwa nipiy pimipayicikêwin. Kîkway kâ-ispayiki kinwâpahcikâtêwa êkwa itasiwâtamihk anihi EIS anima atoskêwin kâ-kî-osihcikâtêw, pimipayicikâtêw, êkwa pônî-apacihcikâtêw ikospê misi-wikamikwa êta kâ-wîkîcik miywâsinwa êkwa ahkami apacihcikâtêwa, kinosêwak êkwa pisiskiwak miywâyâwak, ayisîniw miywâyâwin kanawêyicikâtêw, astêwa kîkway ka-apacihcâtêk askiy, tâskoc iyiniw pakitinikowisowina, êkwa ahakami kiyohkêwin êkwa sônîyahkêwin. Anima EIS itasinahikâtêw kwayisk itôtamowina, kinwâpahcikêwina, êkwa asotamâkêwina osci Denison ka-ayâcik sohkêyimowin anima atoskêwin ê-pimipayik êkwa ispayihowin osci atoskêwin osihtâwin, pimipayicikêwin, pônî-apacihcikâtêk astêwa êkota ahpô apisîs itêhtamowina ispayihowina.

misawê, ôma atoskêwin itêhtâkwan kwayisk ta-ispayik askîhk pihci kotakwa wâtihkêwina. pihtaw osci, anima ISR wâtihkêwin itôtamowin, anima atoskêwin astêwa namôya mistahi kîkway ê-nakacikâtêki kâ-kîsi-kanâcihtâhk pihci kotakwa wâtihkêwina ahpô atâmihk askîhk wâtihkêwina êkwa kotakwa itôtamowina.

mistêhtâkwan, Denison pâ-pîkiskwâtêwak iyiniwak êkwa kotakwa atoskêwikamikwa, ayisîniwak, êkwa kanawêyicikêwak ikospê 2016. Mâmawi itôtamowin isi pîkiskwêwin êkwa yahtohtahikêwin osci anima atoskêwin wihtamwak ôki ayisîniwak ka-miyo-ispayiki atoskêwina êkwa anihi EA nanâtohk êsi. Denison wâpahtamwak anima EIS tâskoc mistêhtâkwahk wiycikêwin kîkway ka-sihtoskamihk nîkânihk itôtamowina êkwa pîkiskwêstamwak pêyak itôtamowin êkota kâ-ayimahk EA, masinahikêwin, êkwa pakitinamihk kaskatêw asiniy wâtihkêwin wikamik êkota kanâta.



tântê

anima Wheeler River atoskêwin
astêw êkotî kîwîtinohk
Saskatchewan êkota Athabasca
kapâwin.

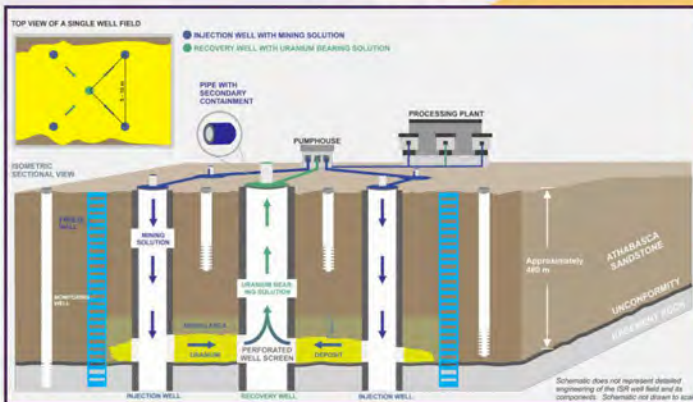
atoskêwin kâ-êsi nakatamihk

animi kihci atoskêwin
apacihcikana astêwa êkota situ
kâwi-miskamihk wâtihkêwin
êkwa osihtâwin wikamik.

êkota SITU kâwi-miskamihk

êkota situ kâwi-miskamihk apacihcikâtêw kisitêk
âpoy ka-otinamihk kaskatêwi asiniya osci askîhk
isi cîstamihk êkwa kâwi mônahipâna. Anima
osihtâwin wikamik astêwa maskimota êkwa
apacihcikana ka-otinamihk kaskatêwi asiniy osci
situ kâwi-miskamihk isi osâwi wihkihasikan.

Denison ka-atâwâkêwak anima osâwi
wihkihasikan ka-apacihtâhk ka-sipwêpitamihk
wâskwatawêwikamikwa, sihtoskâtahkik
okâwiymâw askiy itôtamowina ka-nîkipitamihk
pihcupowi kaskâpahtêwina.



mistakihtêki apacihcikana & atoskêwina waskawêwina

Denison kinwâpahtwak kîkwaya,
isihkâtêki mistakihtêki ispayihowina osci
anima atoskêwin êyikoni kîkwaya.



Wheeler River Project – Denison Mines

Ēłóchëlë Nih Bazi t'áú nih besoídi ha si erit'is.

T'aghá Holnį si diri nih bazi nuhhel kodi hasj.

Diri Wheeler River – Denison Mines nih sēnolye ha si, t'au nih nághįna ha (situ) Yanathē tthe ghą nade ha si.

- Yathē nene diri Saskatchewan k'eyaghē hoʔą si Canada tth'i k'eyaghē.
- Diri t'au tu t'arat'į si senalye ha, t'a ghą nade si konųhełnį ha. Kon/tthe slįnį (Uranium) senalye seráde ha, tulu k'e ts'etai sēlye, yoh tth'i ts'etai sohúde ha. Beyets'et'ali neltła ha tth'i senuhut'a ha. T'aʔu tu t'arat'į si (tu slįnį) sohulye ha. Diri t'aʔu nih t'arat'į si senalye ha hodi sj.
- 'Senahulye de, tu nezų, tthe slįnį t'aʔu senalye ha. Kon bēt'á asi hēt'ěl si, t'ēs tth'i ts'etai sēlye si."
- Ku diri halye ha si, t'áchaghē, tthe t'a bohełtaile si, t'aʔu nih dałdhe nįsi, tu, tujērē-ú, tsą tue-ú, t'aʔu tthe t'arat'į si tu hēł si, sēlye ha. Ku diri asi ghą nade t'a horehth'a si ya bazį tth'ų. T'a tu senalye si eyi tth'i hahodi.
- Diri tthe slįnį (uranium) łes ʔahot'į alye si bēt'á kon hołe, kon heltsi ha. Diri kon uranium t'a holį de, dēhth'agh hile snį.
- Diri nih Senahulye si bónįther de tononą (300) ts'etai sohulye ha si. Łononą- įłk'etoną tth'i Dene ěghádálana ha sj. Diri bónįther de beyets'et'ali t'arat'į ha.
- Diri t'a bēghą Eghalada ha si tóną-įłk'edįghį nene-ú, nake nene ts'etai sohúde ha-ú, sọlaghe nene t'a nuhųt'ą si nanelye ha, Sọlaghe ts'adhel nene ts'etai senahulye ha.

Diri nih senahulye si horelyų net'į, nih-ú, ya-u t'áú besuwidi ha.

T'aʔu nih ts'etai sēlye ha si, t'a Dene yēghą erit'is dałtsi hotié deʔą (engineering), erit'is nédhé bets'į deʔą, t'aʔu nih hotié ts'etai ʔalye ha.

Diri t'aʔu aresį henį, nih nechozē ʔańį sj, įlaisdįghį nih hultsai anįtttha u, kuli horįchoze ʔats'edi sj, T'a ha seráde si tthe slįnį (uranium) halye ha hodi sj łonēną nene ha hodi. Ku diri t'a the slįnį halye hasi, sọlaghe ts'adhel nene tthe nezų halye ha henį. T'át'ų tthe įłk'etaghē limil (łonēną ąnelt'e) ʔaįđdath henį, kuli lota limil tthe hilchu has henį. Kuli sọlaghe ts'ēdel nene anįtttha de nake ts'adhel limil ʔaįđdath the hilchu hasi. Eyi t'a soloną (percent) hoʔąnelt'e tthe hilchu ha henį sj.

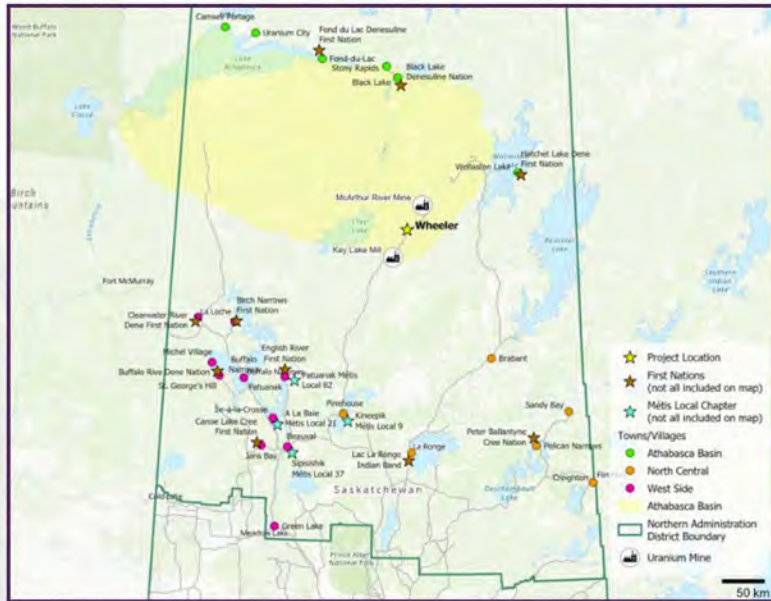
Diri bēt'á Eghalada si t'au nih ts'etai sēlye si, bēhchēnē tth'i la ha-ú, horetth'a t'au, asiʔaldel tth'i ła-ú, tu t'a bēt'á Eghalada si besorįthēn ha la. ʔątu nih, tu-ú, ya ts'en boʔēłta hasą. Kuli yedołnį ha henį.

Diri bēghą Eghalada si, yēghą ěghadálghēna hoyaghē ts'etai sedáhúlye-ú, łue-ú, nųneshe, ěch'ērē, hotié besoídi ha, Dene t'a dághēna. Denesųłine nih t'a dághēna la, nuhhene theri hoʔą. Nih-u, tu-ú, ya-ú nuųha besudi hoʔą.

Diri t'aʔu nih ghą ěghádálana si hotié bahodi, t'aʔu erit'is holį si hotié déʔą, t'aʔu ts'etai sohúde-ú, t'aʔu ěghádálana-u, t'aʔu nih senalye si hotié déʔą.

Diri t'aghą ěghádálana si hotié nih hodi ha henį, yanįzi t'aʔu nih hesdohołts'į si konalyehaile dųų henį. T'a tthe nih-u, tu-u, ya-u bēt'á nezųle ni, dųų tthe slįnį si bēt'á nih-u, tu-u, ya-u hesedowełnį ha henį. T'a tthe nih horįcha nailts'el nį, nih yaghē tth'i dēgharē nih nárałts'ul nį – dųų kone haile henį.

Dųų de t'a benenē k'e ěghadálghēna si bedóghelįnį déʔą, hotié t'a ghą ěghadalaida si bełkoridi hoʔą 2016 hots'į. Diri t'a bēghą náide si t'a benenē si beł hoʔą. Nih hodi hoʔą, tu-u, ya-u boghedi ha. Diri t'a erit'is beł'azi (license) si, horelyų sohúde déʔą, diri Canada k'eyaghē tthe slįnį ghą naidi hade.



LOCATION

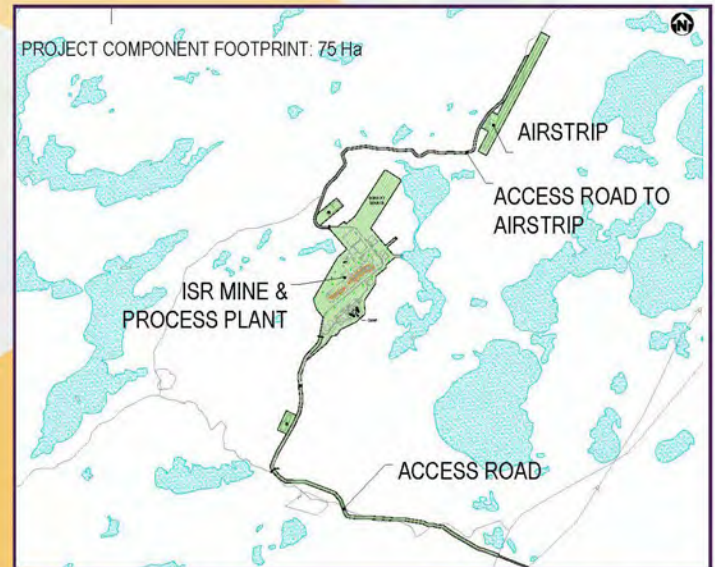
Ku diri k'eyaghë deht'is si t'a
ts'en ëghadálghëna hasi horet'ì –
Dene nenene k'e.

PROJECT FOOTPRINT

Diri t'a yet'a nih ghà nade has si
deht'is sj.

IN SITU RECOVERY

Diri tu het'el t'a tthe slìnjì hilchu, horjcha horet'ì
la, t'at'u tthe sëralye si bët'a les hoë. Ku eyer
hots'ì les bëghà nánì, horelyu nene k'e, t'a
horehtth'a ch'a hodołni sj. Eyi ʔarałnjì
Greenhouse Emissions, diri nih k'e náide si
besoıdı ha.



VALUED COMPONENTS & PROJECT INTERACTIONS

T'aʔu nih besoıdı hasi Dene
yek'odarëlyä hasa.



Wheeler River Project – Denison Mines

Draft Environmental Impact Statement

Project Overview

The Wheeler River Project (the Project) is Denison's proposed in situ recovery (ISR) uranium mine and processing plant:

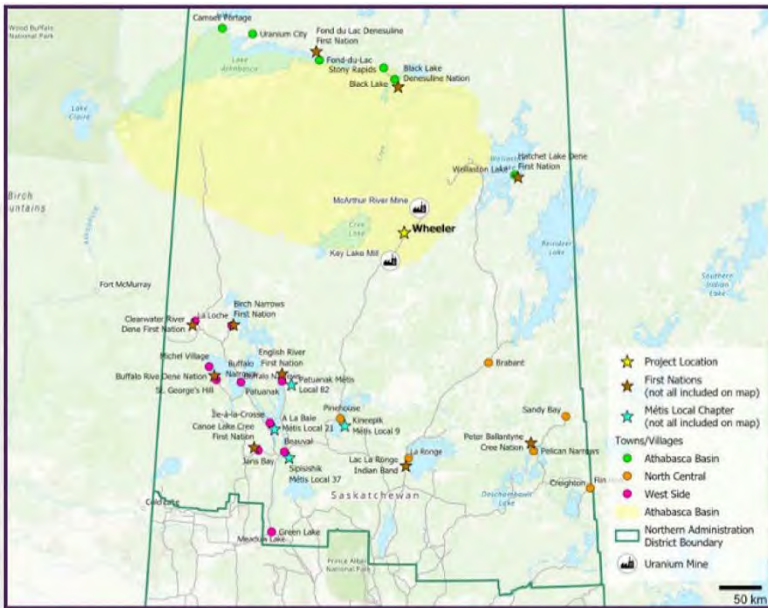
- Location: northern Saskatchewan, Canada.
- Project components and activities: the central Project components are the ISR mine and the processing plant. Supporting Project components and activities include those needed for waste management, water management, distribution of electricity, and transportation, such as pads, ponds, buildings, roads, and an airstrip.
- Inputs: freshwater, chemicals (for mining, uranium processing, treating water), electricity, and fuel.
- Outputs: waste (organics, clean waste rock, special waste rock (drilling core), domestic waste, industrial waste, precipitates from the processing plant and water treatment, sewage), air emissions including greenhouse gas emissions (GHGs), noise, and treated effluent.
- Product: U_3O_8 or yellowcake. The product Denison sells is ultimately used as fuel in nuclear power plants, supporting global efforts to reduce GHG emissions.
- Employment: Approximately 300 workers during Construction and 180 during Operation. The Project will be operated as a fly-in-fly-out operation.
- Project duration: Total of approximately 38 years, about 2 years for Construction, 15 years for Operation, 5 years for Decommissioning, and 15 years for Post-Decommissioning periods.

The environmental assessment (EA) outlined in this environmental impact statement (EIS) was transparent and conservative, following a standard, step-wise approach for evaluating Project effects including cumulative effects. In an effort to generate a conservative EA and provide operational flexibility, Denison developed an assessment basis for the EA which bound, or was higher than, the current understanding of the Project's engineering design basis. For example, the direct Project footprint based on engineering site plans is about 75 ha, but the EIS assumed the Project's area of disturbance was closer to 170 ha. Similarly, the annual production for current engineering design is 6 Mlbs U_3O_8 per year over 10 years, but the EIS assumed production of 9 Mlbs U_3O_8 per year over 15 years, with a peak production up to 12 Mlbs U_3O_8 in a given year to allow for operational flexibility. This means that, for example, the EIS assessed inputs needed and outputs generated on an annual basis as being 50% more than expected.

Residual effects remaining after mitigation were largely linked to land clearing, increases in traffic, emissions to air, waste generation, and water management. Residual effects were evaluated for 32 Valued Components (VCs) and significance determined for receptor VCs. The evaluations and conclusions of the EIS are that the Project can be constructed, operated, and decommissioned while regional plant communities are stable and continue to function, regional fish and wildlife populations are viable and healthy, human health is protected, there is continued opportunity for land use activities, including exercising Indigenous rights, and there is continued social and economic viability of local economies. The EIS outlines mitigation measures, monitoring requirements, and commitments needed for Denison to have confidence that Project is operating as planned and that the actual effects resulting from Project Construction, Operation, and Decommissioning are at or below predicted effects.

Overall, the Project has the potential to achieve a superior standard of environmental sustainability when compared to conventional uranium mining operations. Owing, in large part, to the use of the ISR mining method, the Project has potentially fewer residual effects remaining after mitigation when compared to conventional open pit or underground mining methods and conventional milling activities.

Importantly, Denison has been proactively engaging with Indigenous communities and organizations, the general public, and regulatory agencies since 2016. The use of a collaborative approach to engagement and advancement of the Project is exemplified by the input these groups have provided to influence both project designs and the EA in various ways. Denison views the EIS as an important planning tool that will be used to support future activities and represents one stage in the rigorous EA, licensing, and permitting process for a uranium mining facility in Canada.



LOCATION

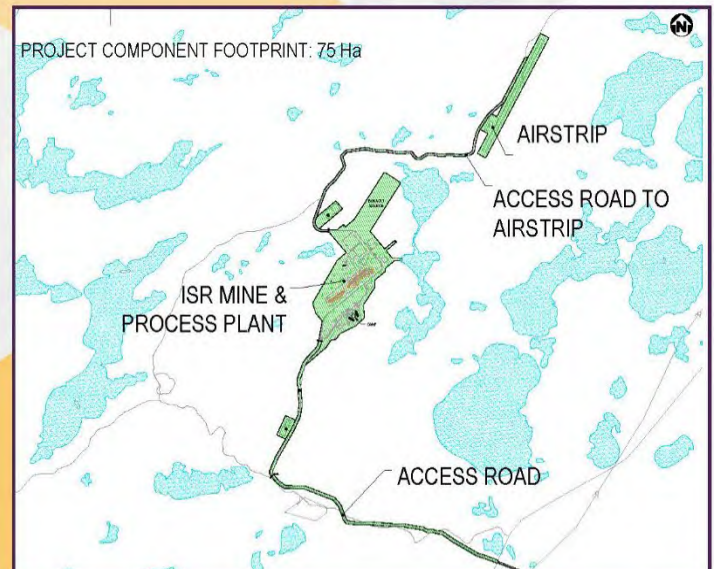
The Wheeler River Project is located in northern Saskatchewan in the Athabasca Basin.

PROJECT FOOTPRINT

The main Project components are the in situ recovery mine and the processing plant.

IN SITU RECOVERY

In situ recovery uses an acidic solution to leach uranium ores from the ground through a series of injection and recovery wells. The processing plant houses the tanks and equipment to process the uranium recovered from in situ recovery into yellowcake. Denison will sell the yellowcake to the market for use in nuclear power plants, supporting global efforts to reduce greenhouse gas emissions.



VALUED COMPONENTS & PROJECT INTERACTIONS

Denison is assessing elements, called valued components, important to people or the environment, and the potential effects of the Project on these elements.



Powering
**PEOPLE, PARTNERSHIPS
AND PASSION**

Open House

Village of Ile a la Crosse

Rossignol High School - John Arcand Room

Oct 25, 2023

5:00pm to 8:00pm

Wheeler River Project

Come to meet with Denison staff, to discuss the Project, to share a meal, and to get a chance to win great door prizes.



Information



Community Supper



Door Prizes

This is a public event open to all residents and people of surrounding areas. Denison is working with Métis Nation - Saskatchewan to arrange separate meetings with Métis leadership and citizens to understand the distinct interests of the Métis in respect of the Project.

 **Denison Mines**

redefiningmining.ca | denisonmines.com

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 **Denison Mines**

redefiningmining.ca | denisonmines.com



Birch Narrows Dene Nation

Administration

P.O. Box 40

Turnor Lake, Sask

S0M 3E0

Telephone: 306.894.2030

Facsimile: 306.894.2060

Email: officemanager@birchnarrows.ca

January 16, 2024

Attention:

Ms. Janna Switzer

Director, HSE Regulatory Compliance

Denison Mines

Birch Narrows Dene Nation is in receipt of your letter dated November 29, 2023 where Denison provided a response to the Birch Narrows Dene Nation comments on the draft Environmental Impact Statement for the Wheeler River Project.

Thank you for this response. The attachment to your letter provides detailed technical responses to draft EIS comments, many of which were highly technical in nature. We appreciate the efforts of your team to respond to our comments on the draft EIS. Your responses on these items adequately address the questions raised by BNDN in respect of the Project.

I also see that you provided responses regarding more general aspects of the environment that are important to Birch Narrows Dene Nation Members such as the protection of the environment, water and land. I can confirm that these responses provide answers to the general areas of concern that are important to many of our community members, and find them satisfactory at this time.

I know you have been in discussions with Birch Narrows Dene Development Inc., about potential opportunities for our development corporation to participate in the advancement of your Wheeler River Project. I encourage these discussions to continue, and would ask you connect with Simon Pollard, our CEO, to continue these discussions. We would appreciate updates about progress with respect to your Project and this can occur through your interactions with BNDDI or to the Nation directly in the future.

Thank you,

Chief Jonathon Sylvestre
Birch Narrows Dene Nation

cc: Simon Pollard - CEO, BNDDI
Carolanne Inglis-McQuay – Director, Corporate Social Responsibility, Denison Mines



02 February 2024

Janna Switzer
VP Environment Sustainability and Regulatory
Denison Mines Corp.
345 4th Avenue South
Saskatoon, SK S7K 1N3

Phone: 306-652-8200
Email: jswitzer@denisonmines.com
www.denisonmines.com

Dear Janna:

Thank you for your letter of 23 November 2023 containing Denison's written responses to YNLR's concerns, as articulated in its intervention of Denison's draft environmental impact statement (EIS) for Wheeler River project. In general, your responses are a good start to addressing YNLR concerns and YNLR looks forward to ongoing discussions with Denison on this matter.

For context to this letter: YNLR acknowledges that we are currently in the iterative review stage of CNSC's environmental impact assessment (EIA) process for the Wheeler River project, where CNSC has identified those YNLR concerns that require further collaboration by Denison, with YNLR, to resolve in advance of the public review stage of the EIA process. We also note that CNSC further consolidated YNLR's EIS concerns into 45 issues, and YNLR has agreed to, at Denison's request in our initial meeting of 18 July 2023, to use CNSC's format for these 45 issues as the guide for further discussion. Additionally at that initial meeting, YNLR further requested that Denison's comments and responses to YNLR, for all communications relating to these issues, be in writing.

I will summarize YNLR's review of your November 2023 response in two parts starting with: 1) Denison's table of responses to YNLR's EIS concerns identified by CNSC; then, 2) Denison's technical memo on woodland caribou habitat, that was appended to Denison's response to YNLR's EIS concerns. As part of our response to the technical memo, YNLR is providing the results of its analysis of cumulative effects in the Wheeler River Watershed (attached as appendix 1).

I am looking forward to our scheduled 22 February 2024 meeting; I would like to discuss the agenda with you to allow for a discussion of caribou mitigation plans and offsets as a way forward for YNLR and Denison to mutually address cumulative effects and caribou management

1. YNLR EIS concerns

Most of Denison's responses to YNLR EIS concerns still do not adequately address our concerns. Specifically, YNLR has taken the position that it should be an active participant in the development of all components associated with the Wheeler River project. It is not acceptable to YNLR to be consulted after a plan and/or a process is already developed. We wish to be actively involved throughout any process on environmental, cultural and economic matters affecting Nuhenéné. We recognize that the YNLR Board of Directors, representing our communities, is actively involved in negotiations towards establishing an Impact Benefit Agreement for the Wheeler River project. In parallel with the

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requirements of the EIA process; we anticipate further resolution of YNLR's concerns, to be discussed and addressed through these negotiations.

2. Denison's technical memo on woodland caribou habitat

YNLR's conclusion differs from Denison's EIS regarding the environmental impacts to woodland caribou habitat and the level of cumulative effects (CE) currently existing in the Wheeler River watershed (that encompasses the Regional Study Area addressed in the EIS). This position is based on YNLR's own CE analysis of this watershed (see Appendix 1). The methodology used in this analysis is derived from the Federal Woodland Caribou Recovery Plan (2020), which has been accepted and endorsed by both provincial and federal governments. In further substantiation of the Federal Plan and its guidance;

- YNLR has presented its preliminary cumulative effects methodology to federal and provincial government agencies; who have supported both the methodology and results obtained by YNLR;
- industry support for woodland caribou and CE comes from NexGen's recent EIS submission for their proposed mine in Nuhenéné. This EIS, for a different area of Nuhenéné with similar levels of existing disturbance, concludes that CEs on woodland caribou are significant; and
- additional government support comes from Saskatchewan's Ministerial Decision accepting NexGen's EIS submission, including its position on woodland caribou and CE, and through its requirement for a caribou mitigation and offset plan

It is YNLR's position that our CE analysis is a reliable representation of the current caribou habitat status in the Wheeler River watershed. Simply stated, the level of human and natural disturbance in the watershed already exceeds the federal caribou conservation guidelines, and therefore any additional disturbance from Denison's project should be deemed 'significant'. We therefore believe that the way forward for Denison and YNLR is a discussion on caribou mitigation and offset plans and we look forward to discussing this topic at our 22 February meeting.

To conclude YNLR acknowledges, with respect and appreciation, Denison's foresightedness, courage, and progressive nature when it set the standard for the Saskatchewan mining industry by being the first corporation to sign an Exploration Agreement with YNLR that addressed the environmental, economic, and social realities of conducting exploration in Nuhenéné. However, we do not believe that the draft EIS adequately reflects Denison's progressive approach and look forward to further collaborative discussions with Denison to produce an EIS and subsequent process that reflects a mutually beneficial partnership for future development in Nuhenéné.

Respectfully



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

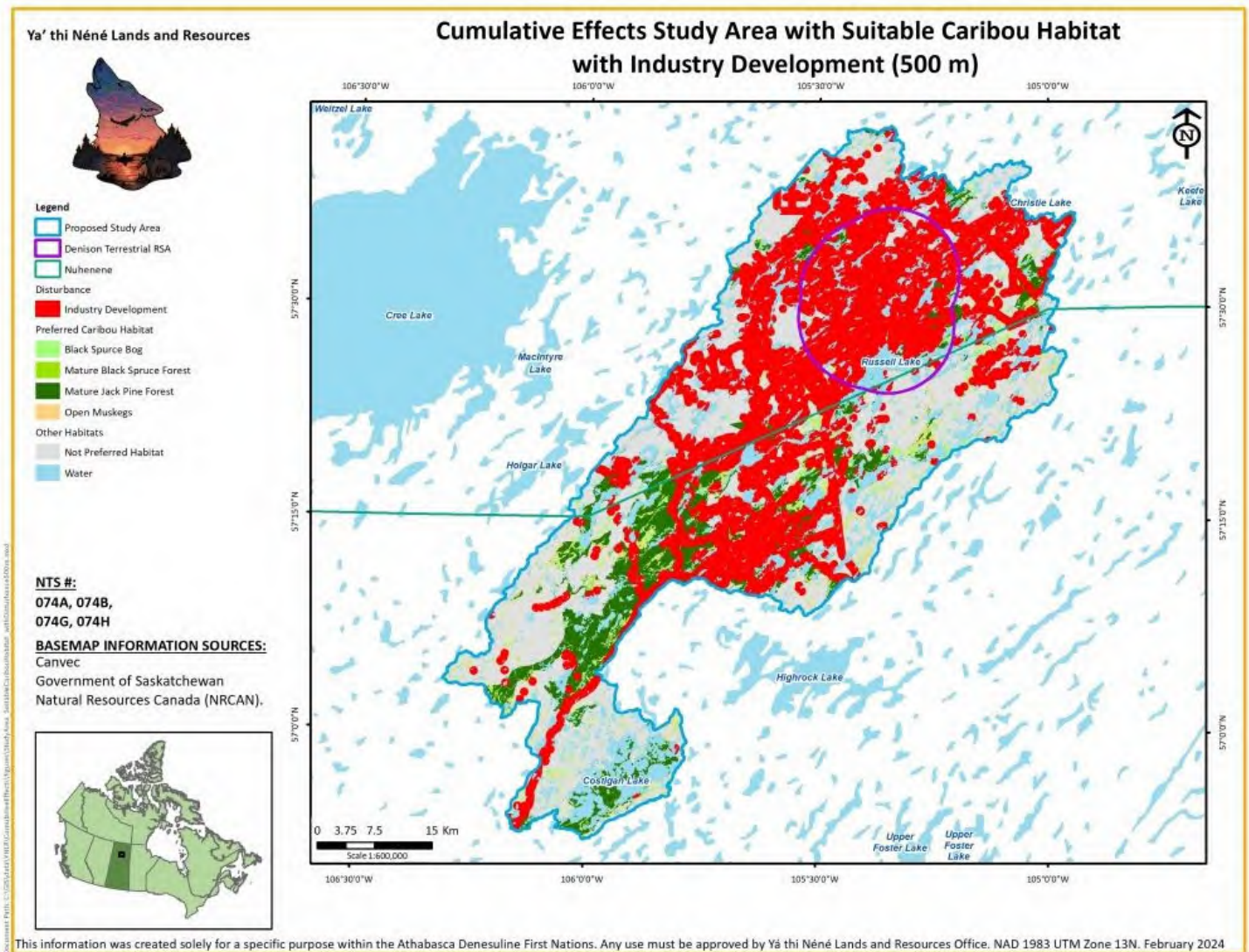
attachment: YNLR's July 2023 Cumulative Effects Study Area with Suitable Caribou Habitat with Industrial Disturbance (500m)

cc: Garrett Schimdt, Executive Director, YNLR

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Appendix 1:



Cumulative effects analysis of natural and human disturbance in the Wheeler River Watershed, which contains Denison's regional study area outlined in blue. All human disturbances are buffered by 500m as per Environment Canada guidelines. Red indicates unsuitable habitat for woodland caribou (81%); green indicates suitable habitat for woodland caribou (19%).

From: [Carolanne Inglis-McQuay](#)
To: [Bruce Hanbidge](#)
Cc: [Megan Wallace](#); [Dana Kellett](#); [bfraser](#); [Jason Dietrich](#); [Janna Switzer](#)
Subject: Follow up from Meeting on February 22, 2024
Date: Friday, February 23, 2024 1:56:00 PM
Attachments: [20240222-DEN_YNLR-WRP_CEA_Meeting.pdf](#)
[20240222-YNLR_DEN-Agenda-TechnicalMtg.docx](#)
[S9_App 9-E Caribou Management Framework.pdf](#)
[S16_App 16-C Summary of Monitoring & Follow-up Programs Wheeler River.pdf](#)
[Denison WR Project Commitments Register FEB 2024.pdf](#)
Importance: High

Hi Bruce –

On behalf of Janna, Brian, Jason and myself, I want to extend our gratitude to you and your team for meeting with us to discuss cumulative effects and collaboration on programs going forward. The time and effort made by all to come prepared to work together to understand each others' perspectives, listen, and develop a path forward is truly appreciated.

As we committed to doing during the meeting, please find attached the following documents:

1. The final agenda for the meeting
2. Denison's presentation given during the meeting
3. The Caribou Management Framework (recently filed with the revised draft EIS)
4. Section 16 – Summary of Monitoring & Follow-up Programs for Wheeler River
5. Denison Commitments Register_FEB2024, which provides the commitments made by Denison in the revised draft EIS and relevant documents as of the filing of the draft revised EIS (Feb 10, 2024)

As we stated in the meeting, we are committed to working with the YNLR in a manner requested of us. As such, we welcome your feedback on the draft Caribou Management Framework, and would welcome your direction on other areas (based on the monitoring and follow-up programs for Wheeler River or other) of interest going forward.

I look forward to hearing from you at your convenience.

Thank you again and have a good rest of your day,
Carolanne

Carolanne Inglis-McQuay

Director, Corporate Social Responsibility

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

345 4th Avenue South

Saskatoon, SK, Canada, S7K 1N3



TSX: DML | NYSE MKT: DNN

From: [Bruce Hanbidge](#)
To: [Janna Switzer](#)
Cc: [Carolanne Inglis-McQuay](#); [Garrett Schmidt](#)
Subject: [**]YNLR individual comments on Denison's responses.
Date: Wednesday, March 13, 2024 2:46:19 PM
Attachments: [image001.png](#)
[review of Denison responses to YNLR Comments on their EIS - FINAL.pdf](#)

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

Jana:

Please find attached YNLR's individual comments to Denison's responses to our concerns with the Denison's draft EIS

The comments address Denison's responses on pages 1 to 19, as these dealt with issues primarily relating to aquatics monitoring. Denison's responses on pages 19 to 39 dealt with woodland caribou, cumulative effects, and other terrestrial matters and as such they were addressed in our meeting of 22 February 2024 with Denison and their representatives from Ecometrix.

Respectfully

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



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A handwritten signature in blue ink that reads 'Bruce Hanbidge'.

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November 23, 2023

Bruce Hanbidge
Operations Manager
Ya'thi Néné Land and Resource Office
335 Packham Ave Unit 100
Saskatoon, SK S7N 4S1

Sent via email: bruce.hanbidge@yathinene.ca

Dear Bruce:

Thank you for your letter dated July 20, 2023 shared with us following our meeting of technical experts to *generally* discuss the comments made by the Ya'thi Néné Land and Resource Office ("YNLR") on the Wheeler River Project ("the Project") draft Environmental Impact Statement ("EIS"), provided to the Canadian Nuclear Safety Commission ("CNSC") on March 4, 2023. During the meeting on July 17, 2023 we appreciated the opportunity to broadly discuss the concerns raised about the EIS.

Over the past months, Denison has been working diligently to consider the comments made by the YNLR and respond to the July 20, 2023 request to provide written responses to the comments and questions that were raised in the YNLR's intervention. As such we are pleased to provide you with comprehensive responses in this regard. Please note, the format for our responses is set out in table form, following the manner in which the CNSC provided Denison with the complete suite of public comments made on the EIS. Additionally, we've also attached a technical memo with respect to a series of comments raised with respect to woodland caribou habitat and the relationship between the Project and the existing disturbances on the landscape.

We trust this information will provide clear responses to the issues identified by YNLR, and demonstrate that the Project, as proposed and assessed, is a sustainable mining project, and we look forward to hearing from you upon your review of the materials enclosed.

Sincerely,

A handwritten signature in blue ink that reads 'Janna Switzer'.

Janna Switzer
Director, HSE Regulatory Compliance

Cc: Garrett Schmidt – YNLR
Dana Kellett – YNLR

Attach: Table: Denison Responses to YNLR draft EIS Comments
Memo: Denison Response to Woodland Caribou Habitat Comments

Denison's Responses to Comments from YNLR on the Wheeler River Project draft EIS
November 23, 2023

Denison's Responses to Comment from Ya'Thi Néné Lands and Resource Office (March 4, 2023) for the Wheeler River Project Environmental Impact Statement

| Ref. No. | Source | Reference to EIS, appendix, or supporting documentation | Comment Summary (all original submissions can be found on Canadian Impact Assessment Registry reference: 80171) | Denison Response |
|----------|--|---|--|---|
| 375 | Ya'Thi Néné Lands and Resource Office (YNLR) (March 4, 2023) | EIS Executive Summary, p. 2 | <p>Comments #1, 2 and 3, Appendix A: YNLR sees a potential benefit of the in-situ approach as it is designed to reduce the surface disturbance of the Project, and the potential leakage of contaminants from excavated rock and tailings. However:</p> <ul style="list-style-type: none"> YNLR is concerned that the extraction of source water for the Project may have a negative effect on stream flows both below- and aboveground. YNLR is concerned with the potential effects of contaminants released during and after the Project. | <p>Denison acknowledges these concerns and notes the comment from YNLR references the Executive Summary. Both of the areas of interest raised by the comment are addressed in the main part of the draft EIS and supporting appendices. Denison refers YNLR to the following sections for comprehensive evaluation of these aspects of the Project:</p> <ul style="list-style-type: none"> Potential changes in surface water quantity as the result of the Project, including consideration of water taking activities, are presented in the hydrology assessment (draft EIS, Section 8.1). Potential changes to groundwater quantity and quality as the result of the Project, including consideration of the long-term implications of the mining method, are presented in the groundwater assessment (draft EIS, Section 7). Specifically, the 'future centuries' temporal scope of the assessment for Groundwater considers the period for which the highest COPC concentrations in groundwater are predicted to interact with surface water based on groundwater modeling described in Appendix 7-C. Due to the relatively long travel time (relatively low groundwater velocities) between the mining area (Section 7.6.2.2.3) and the surface water environment where groundwater/surface water interactions are expected, as well as the potential for chemical reactions along the groundwater flow pathway, a 'future centuries' scenario was deemed appropriate to fully assess potential future effects beyond the Project timeline (i.e., 0 to 38 years). The 'future centuries' temporal scope was also developed in recognition of the concerns raised by Interested Parties through the engagement process around the potential for the Project to influence water quality into the future. <p>These assessments, completed in a transparent and rigorous manner, concluded that residual effects of the Project would not be significant. Follow-up and monitoring programs will be employed to confirm mitigation measures are functioning as planned and to confirm EA predictions. For example, a groundwater monitoring plan, including an excursion contingency plan and measures for adaptive management will be implemented for the Project.</p> |

Denison's Responses to Comments from YNLR on the Wheeler River Project draft EIS
November 23, 2023

| Ref. No. | Source | Reference to EIS, appendix, or supporting documentation | Comment Summary (all original submissions can be found on Canadian Impact Assessment Registry reference: 80171) | Denison Response |
|----------|-------------------------|---|--|---|
| 376 | YNLR (March 4, 2023) | EIS Executive Summary, p. 2 | Comment #4, Appendix A: based on the information from p. 2 of the Project Overview: YNLR assumes no permanent work camp will be constructed YNLR expects that a sizeable proportion of the Project workers will be hired from the local and regional area. | <p>Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan, inclusive of YNLR) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. YNLR businesses would fall in the category of northern Saskatchewan businesses, which would place them in line for second preference if project needs cannot be met within the local study area.</p> <p>Details on the Project components are provided in EIS Section 2. The Project will be operated as a fly-in/fly-out mine, meaning the opportunities for interactions between the workforce and Indigenous communities are limited as workers will be transported by air directly to the site. The proposed camp or accommodations facility is anticipated to be a turnkey building manufactured off site and assembled and commissioned on site. The building's design will be sized to accommodate a peak load of about 190 individuals during Operation; however, due to its modularized design, additional modules can be easily installed should additional beds be required in the future.</p> <p>Section 13 provides the assessment for the key indicator of employment and training, which is a component of the Economy Valued Component. A summary of residual environmental effects on employment and training is found in Table 13.5-2. Employment opportunities represent direct and indirect benefits associated with construction and operation of projects, particularly in the vicinity of communities where unemployment is typically high.</p> <p>Additionally, because the property is located on Crown Land, a mineral surface lease agreement will be negotiated with the Province, specifically the Ministries of Environment and Government Relations. The agreement grants surface rights for the purpose of accessing the land to extract minerals under the Crown Resources Land Regulations. The mineral surface lease agreement</p> |

Denison's Responses to Comments from YNLR on the Wheeler River Project draft EIS
November 23, 2023

| Ref. No. | Source | Reference to EIS, appendix, or supporting documentation | Comment Summary (all original submissions can be found on Canadian Impact Assessment Registry reference: 80171) | Denison Response |
|----------|----------------------|---|---|---|
| | | | | provides long term rental of Crown land for mining and milling in Saskatchewan. The agreement also contain specific commitments for environmental protections for the life of the project, OH&S protocols, reporting requirements, and socio-economic benefits for residents of northern Saskatchewan. |
| 377 | YNLR (March 4, 2023) | EIS Executive Summary, p. 2 | Comment #5, Appendix A: YNLR is concerned with the potential increase in road and off- road traffic affecting wildlife and fisheries sustainability | <p>Please note that the Project will not change public access to the area. The existing gate on Highway 914 near Cameco's Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project. The proposed operation is fly-in, so Project related traffic to the area would only be related to deliveries of materials to and from the site. On-site staff will not have access to personal (or company) vehicles and will largely be "confined" to the camp and work areas during their shifts.</p> <p>Refer to draft EIS, Section 12 Quality of Life for the assessment of potential Project effects on the Key Indicator of Infrastructure and services (traffic) and the associated measurable parameter of change in traffic volumes and types and risk of accident.</p> |
| 378 | YNLR (March 4, 2023) | EIS Executive Summary, p. 2 | Comment #6, Appendix A: YNLR supports this built-in precautionary approach to the Project's risk assessment. However, given the lengthy timeline of the Project, YNLR would like to see that lost (i.e., unmitigated) wildlife and fisheries habitat be offset in some manner. A response to this should be approached through an anticipated impact benefit agreement. | <p>Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. Additional detail regarding the Caribou Mitigation Plan is also provide in the memo that is attached to this comment disposition table regarding the Project-specific cumulative effects assessment (CEA).</p> <p>It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting</p> |

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| | | | | <p>applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p>No other specific needs for "offset" have been identified based on the effects assessment.</p> <p>Denison will continue to engage with YNLR on topics of interest.</p> |
| 379 | YNLR (March 4, 2023) | EIS Executive Summary, p. 2 | <p>The EIS Executive Summary outlines mitigation measures, monitoring requirements, and commitments needed for Denison to have confidence that Project is operating as planned and that the actual effects resulting from Project Construction, Operation, and Decommissioning are at or below predicted effects.</p> <p>Comment #7, Appendix A: Despite these reassuring statements, YNLR is aware that predictions may fall short, hence the need for close collaboration with Indigenous Peoples, communities, and organizations, including their input into the design and implementation of transparent and statistically-robust project monitoring programs.</p> | <p>Denison acknowledges the comment and is committed to ongoing engagement and dialogue with interested parties with respect to monitoring. Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.</p> |
| 380 | YNLR (March 4, 2023) | EIS Executive Summary, p. 2, 12, 44, 45 and 47 | <p>Comments #8, 10, 21 and 22, Appendix A: YNLR remains concerned about the nature and disposition of project contaminants during and after the mining process.</p> <ul style="list-style-type: none"> YNLR supports the Project outcome of lower aboveground disturbance, it retains concerns about the management inputs and outputs of the ISR method, particularly project water sources, quantity, and release along with its associated contaminants. The release of contaminants before and after the Project's completion worries YNLR, which sets a high priority on clean and abundant groundwater and surface water. The Indigenous People, communities, and organizations YNLR represents will be here long after mine decommissioning, so minimizing this risk with statements regarding the length of time it takes is not helpful. | <p>Denison acknowledges the comment and concerns raised by YNLR. Denison believes the assessment of potential effects, such as those highlighted in the review comment, have been considered in a robust manner in the EIS and appropriate mitigations have been proposed. Denison is committed to ongoing engagement and dialogue with interested parties on key Project aspects such as that referenced in the review comment.</p> <p>With specific reference to site decommissioning the following is noted. Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> |

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| | | | <ul style="list-style-type: none"> As with groundwater, YNLR places a high value on the quantity and quality of surface waters. Monitoring of water will be critical, and YNLR expects to be consulted and heavily involved with respect to this activity. | Please also see Denison's response to YNLR comments 1, 2 and 3 above, for further relevant information. |
| 381 | YNLR (March 4, 2023) | EIS Executive Summary Freeze Wall, p. 12 and 13 | <p>Comments #11, 12 and 13, Appendix A: Containment of the mining solution and uranium bearing solution within the mining area will be achieved through a defence-in-depth approach with three levels of containment.</p> <ul style="list-style-type: none"> YNLR assumes that information and data exist with respect to the environmental safety of freeze wall technology in uranium mining operations within Saskatchewan. Has Denison reviewed these data and are they considered/presented as part of this EIS? If not, why not? What happens to the freeze wall and its retained contaminants at the end of the Project's life? – despite safeguards and remediation, it has potential to release contaminants after mining is completed. Monitoring and adaptive management are important components of sustainable uranium mining. YNLR expects to be consulted/included in the design and implementation of the Project's environmental monitoring programs. | <p>Denison notes this comment is on the Executive Summary and that more detailed information is available in the main part of the draft EIS e.g., Section 2 Project Description and Section 7 Geology and Groundwater (and associated appendices).</p> <p>Ground freezing technology is well established and used widely throughout the world. Its use in a mining environment was pioneered in Saskatchewan's potash mining industry for shaft sinking activities, and later adapted for use in Saskatchewan's uranium industry. Ground freezing to control and eliminate groundwater from entering mining areas is a fundamental component of two existing Athabasca Basin underground uranium mines: Cameco Corporation's McArthur River Operation and Cigar Lake Operation. Freeze walls, when fully developed, are capable of withstanding significant external pressures because the ice in the pore voids greatly improves the bulk strength of the soil. For example, in the province of Saskatchewan, ground freezing is used to support the sinking of deep potash mine shafts, which must penetrate through the Mannville formation at a depth between 400 and 500 m below surface. The Mannville formation is often described as saturated, unconsolidated beach sand and it would not support shaft excavation in a thawed state. Freezing is used to create a structural and impermeable wall up to 5 m thick, which can resist a stress gradient driven by full hydrostatic and/or lithostatic pressures on the outside of the wall, and an open to atmosphere excavation within the shaft. This loading condition is much more extreme than any condition the freeze walls at the Phoenix deposit will experience because the interior side of the freeze wall where active ISR mining is occurring is not open to atmosphere and is fluid filled in the same way that the regional groundwater system is on the exterior side of the freeze wall, creating a balanced pressure system, where loading is equal on both the interior and exterior sides.. While freeze walls are very strong when fully developed, they are also plastic in nature. This means that they can slowly deform without failing in response to localized ground deformations. As the freeze wall deforms towards a lower stress zone, it maintains its thickness and integrity. While the above example referred to potash shafts, other examples can be drawn from the experience</p> |



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| | | | | <p>at the McArthur River or Cigar Lake uranium mines. At McArthur River, open stopes are generated directly adjacent to a freeze wall that is a nominal 4 m thick. At Cigar Lake, open mine cavities 10 m high and several metres in diameter commonly exist within the frozen ground. Neither site has had a breach of the freeze wall during mining activity. Given that the freeze wall at Denison will be much thicker than at McArthur River and that it will be located up to 25 m from the ore zone, it is not anticipated that it will be exposed to a stress environment that will put it at risk.</p> <p>Since the mine design includes the freeze wall as a tertiary management strategy, movement of mining solution is restricted and contained horizontally during operations. Wellfield pumping is the primary form of containment and provides the hydraulic containment to keep mining solution within the 50 m mining area (see Section 2.2.1.4.2). During the operation phase, and under normal operational conditions there is no interaction between the mining zone and surface water or down gradient groundwater environments, and the groundwater assessment (Section 7) focuses on the post-decommissioning period following removal of the freeze wall, once the groundwater flow paths return to pre-mining conditions. During mining area remediation (see Section 2.3.3.1.1), the freeze wall will remain in place until decommissioning objectives are achieved. Refinement of the mining area decommissioning objectives and associated modelling will be done through updates to the Decommissioning Plan, and will be bounded by the objectives evaluated in the EIS. To carefully evaluate how constituents dissolved in the remediated groundwater within the mining area may migrate away from and interact with the environment, a rigorous numerical model of groundwater flow and chemical constituent behaviour along the groundwater flow path was used as a predictive tool. The model is based on proven scientific principles and processes (e.g., groundwater flow, contaminant transport, and geochemical reaction processes) and allowed future conditions to be evaluated. Migration of dissolved constituent concentrations along the groundwater flow path from the mining area to Whitefish Lake (the local surface water receptor) is predicted to take hundreds to thousands of years, with concentrations remaining below values that would result in an environmental risk.</p> <p>Given the nature of the ISR mining method that will be employed by the Project groundwater monitoring is an important consideration. The</p> |



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| | | | | <p>groundwater monitoring plan would be developed in consideration of how Project facilities and activities could interact with the groundwater environment and groundwater users to define monitoring needs (locations, frequencies and constituents). Data generated from the groundwater monitoring plan would serve various purposes, such as to assess performance and the controls associated with the ISR process, demonstrate compliance with internal action levels, assess performance of emissions control systems, and contribute to the understanding of the potential influence of the Project on the groundwater environment. The groundwater monitoring program would demonstrate, during each Project phase, that:</p> <ul style="list-style-type: none"> • excursions are not occurring; if excursions do occur, an early warning/timely signal will be provided of when and where they are occurring such that appropriate further evaluation and actions can be undertaken; • commitments made in the EA are being achieved; and • protection of groundwater end use/receiving environment is being achieved. <p>The groundwater monitoring plan would be informed by existing local and traditional knowledge, ongoing engagement activities with interested parties, information generated by development of EIS and its supporting documents, relevant guidance, such as CSA Standard N288.7-15, Groundwater Protection Programs at Class I Nuclear Facilities and Uranium Mine and Mills as well as any applicable licenses, approvals, and permits.</p> |
| 382 | YNLR (March 4, 2023) | EIS Executive Summary, p.16 | Comment #14, Appendix A: Will the released radon gas be of any concern to natural resources, such as fish and wildlife? | <p>Inhalation pathway to terrestrial wildlife and birds was included in the Ecological Risk Assessment (EcoRA). Please refer to the draft EIS Appendix 10-A Section 5 and an excerpt is provided below for reference:</p> <p>Exposure pathways consider the various routes by which radionuclides and/or chemicals may enter the body of the receptor, or for radionuclides, may exert effects from outside the body. Exposures to environmental media may be direct (i.e., by contact) or indirect (i.e., via constituent transport through the food chain). For each type of ecological receptor, draft EIS Appendix 10-A Table 5-5 summarizes the relevant exposure pathways to various environmental media including air, surface water, soil, and sediment. Airborne COPCs partition to soil and plants. For most COPCs, ingestion pathways dominate over inhalation and air immersion. The latter pathways</p> |

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| | | | | <p>are considered minor pathways in the EcoRA, but inhalation was included in the IMPACT model and is thus included in draft EIS Appendix 10-A Table 5-5.</p> <p>Exposure to constituents that may deposit from air to surface water was not considered, as that pathway is considered negligible according to CSA N288.1-20. As such, a pathway of radon in air to aquatic receptors such as fish was not evaluated. Radiological dose to aquatic receptors is evaluated through water and sediment exposure, as appropriate based on the receptor's characteristics. For fish, aquatic plants, and aquatic invertebrates, contact with water and constituent uptake from water via bioaccumulation represents the main exposure pathway. Direct contact or uptake from sediment are also considered for benthic invertebrates and bottom-feeding fish.</p> |
| 383 | YNLR (March 4, 2023) | EIS Executive Summary, p.18 Land and Resource Use, p. 11- 50 to 11-52 | <p>Comment #15, Appendix A: While Project water reuse is laudable, its overall conservation and management are significant concerns for YNLR, particularly the quantities removed from the ecosystem and the fate of contaminated water released back into the ecosystem from the Project that end up in Wollaston Lake. YNLR expects to be consulted/included in the design and implementation of the Project's environmental monitoring programs.</p> <p>Comment #85, Appendix A: YNLR remains concerned with the potential effects of Project contamination on culturally important natural resources. These concerns stem from the nature of the materials being mined, and the novel method (ISR) by which they are being extracted. Northern residents and Indigenous Peoples will be living here long after the mine is exhausted, thus effective monitoring is critical, as is the inclusion of impacted Aboriginal and Treaty rights holders in the design and implementation of arm's length, transparent, and statistically-robust monitoring programs.</p> | <p>The specific activity of water withdrawal from Whitefish Lake was assessed in the draft EIS, Section 8.1. The conservative estimate of water withdrawal would result in a reduction of flow of about 3% at times of low flow and the lake level could change by 1cm; this minor change is beyond the ability of monitoring techniques to practically measure, and the assessment concluded that the Project would not result in a significant effect on surface water quantity (hydrology). It is noted that there will be a separate permitting process that will consider water withdrawal for Project support that will occur following the EIS. Monitoring, including of water withdrawal rates and of potential effects (e.g., change in water flow, change in lake levels) will be implemented as the Project moves forward.</p> <p>Denison is committed to sharing information with Indigenous Communities of Interest (COIs) in a mutually agreed-upon fashion. Overall, the approach that will be utilized with respect to Indigenous community engagement will be aligned with Denison's Indigenous Peoples Policy. Denison's Indigenous Peoples Policy commits the company to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land. The relevant monitoring plans for the species/resources that support a traditional diet will reflect and incorporate these values and will be reflective of the Indigenous COIs priorities. The monitoring plans when drafted will include more detail about communication methods and their effectiveness would be assessed through ongoing engagement with Indigenous communities.</p> |


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| 384 | YNLR (March 4, 2023) | EIS Executive Summary, p. 26 | <p>Comments #16 and 17, Appendix A: YNLR supports Denison's corporate Indigenous Peoples Policy (IPP) and looks forward to collaborating with Denison to ensure that the Project's socioeconomic benefits reach local Indigenous People. YNLR acknowledges that Denison incorporated the YNLR report into the EIS and looks forward to further working with the company collaboratively regarding the rights of Indigenous People.</p> <p>YNLR is interested in an impact benefit agreement with Denison ensuring mutual benefits from the Project and co-management of environmental monitoring and mitigation.</p> | <p>As outlined in Denison's Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land, and to minimize potential effects, wherever possible.</p> <p>Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca Denesųliné communities' relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesųliné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesųliné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the updated EIS. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. YNLR will be informed throughout the monitoring program design and implementation process.</p> <p>A list of commitments, including specific commitment or mitigation measures related to Project effects as an outcome of engagement, made in the draft EIS, throughout the Federal information request period and the Provincial comment response period, will be included with the submission of the final EIS. For clarity, this would not include any private, confidential accommodations made under contractual agreements.</p> |
| 385 | YNLR (March 4, 2023) | EIS Executive Summary, p. 26, 28 and 59 Land and Resource Use, p. 11- 52 and 11-53 | <p>Comments #18, 19 and 29, Appendix A:</p> <ul style="list-style-type: none"> Indigenous People, communities, and organizations YNLR represents are rights holders, and are not to be arbitrarily grouped and treated as non-rights holders. This is an important distinction, as the rights they hold are constitutionally protected. This must be respected and recognized in the ongoing dialogue between the company and Indigenous Peoples through their chosen representatives, like YNLR. The Athabasca Denesųliné people are rights holders and not stakeholders with respect to the Project. These rights include full access and use of the natural resources of the | <p>Denison acknowledges the comment. In March 2019, Denison was notified by the YNLR that the Indigenous communities within the local Athabasca communities identified were interested in the Project and that YNLR held the Duty to Consult from these communities. Since receiving correspondence from the YNLR office in 2019 Denison has been collaboratively working with the YNLR office in a mutually agreed upon manner and will continue to do so.</p> <p>Denison's approach to identifying Indigenous COIs considered several factors as identified in Section 4.3.1 of the EIS. Being signatories of Treaty 10 was among, but not the sole applicable criteria, and not all Treaty 10 communities are considered as Indigenous COIs for the Project. Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca</p> |

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| | | | <p>area. Any proposed infringement on these rights by the Project will need to be discussed well ahead of the Project's start date.</p> <p>Comment #86, Appendix A: The EIS minimizes effects of Lands and Waters availability and access on northern residents and Indigenous Peoples.</p> <p>Any impairment to the ability of Indigenous Peoples to utilize their Aboriginal and Treaty rights to the use of natural resources for their traditional activities constitutes an infringement of those constitutionally protected rights and must be justified. Rigorous examination of these impacts and negotiated compensation for these impacts should therefore be seriously considered.</p> | <p>Denesųliné communities' relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesųliné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesųliné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the updated EIS.</p> <p>With respect to Denison's consideration of Indigenous Knowledge shared by the Athabasca Denesųliné knowledge sources, Denison notes that Tables 3.5-1 will be updated to better reflect where the YNLR's An Exploration of Recorded Athabasca Denesųliné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of the Denison Mines Wheeler River Project, which was included as an Appendix to the EIS, was considered and included as Table 3.5-1 does not reflect all instances the report was utilized.</p> |
| 386 | YNLR (March 4, 2023) | EIS Executive Summary, p. 52 | <p>Comments #24 and 25, Appendix A: Fish, fish habitat, and fish health are all extremely important to northern people of Saskatchewan, and especially Indigenous People. Wild fish are a culturally important source of protein and provide economic opportunities in the form of commercial fishing and recreational angling.</p> <ul style="list-style-type: none"> YNLR will be eager to and expects to be involved in collaborating with Denison in the future monitoring of these vital natural resources. Based on existing federal fishers legal and policy requirements, YNLR expects that all fish habitat destroyed or altered by the Project will be more than offset. | <p>Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. Denison expects that important country foods harvested for food and cultural purposes (e.g., moose, fish, etc.), surface water quality, and other areas of interest will form parts of these monitoring programs, including other areas of potential concern as they evolve over time. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.</p> <p>The specific potential for need for approval(s) under the Fisheries Act related to effects on fish and fish habitat (i.e., harmful alteration, disruption and destruction) resulting from Project activities has been assessed and presented in the draft EIS. Based on the assessment, Denison has determined that effects can be avoided and mitigated and therefore there will be no need for fish habitat offsets under the <i>Fisheries Act</i>.</p> |
| 387 | YNLR (March 4, 2023) | EIS Executive Summary, p. 54 and 55 | <p>Comment#26, Appendix A: YNLR places a high priority on wildlife and wildlife habitat, from both ecological and sociocultural perspectives. Given the long-time frame of the Project, YNLR are concerned about the lack of significance</p> | <p>Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response</p> |

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| | | | <p>associated with the residual and cumulative effects assessments of all ecological VCs. YNLR believes that the addition of this mine with its associated disturbances will have a cumulative effect on wildlife, especially for woodland caribou, as the area is already crisscrossed with many kilometres of seismic cut lines through the LSA, RSA and beyond (Figure 9.2-6, page 9-83, EIS and Appendix 9B).</p> <p>YNLR maintains that in order for the Project to meaningfully attempt to mitigate this concern, the company must work with Indigenous partners to create an effective habitat offset plan for this species. This should form part of any project approval. Such a plan should, for instance, include steps to restore the considerable caribou habitat degraded by past mineral exploration activities.</p> | <p>to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. Additional detail regarding the Caribou Mitigation Plan is also provide in the memo that is attached to this comment disposition table regarding the Project-specific cumulative effects assessment (CEA).</p> <p>It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p>Denison will continue to engage with YNLR on topics of interest. </p> |
| 388 | YNLR (March 4, 2023) | EIS Executive Summary | Comment #27, Appendix A: Indigenous People have brought forward concerns with the extensive network of seismic cut lines at several places in the EIS. | <p>Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. Additional detail regarding the Caribou Mitigation Plan is also provide in the memo that is attached to this comment disposition table regarding the Project-specific cumulative effects assessment (CEA).</p> <p>It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting</p> |

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| | | | | <p>applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p>Denison will continue to engage with YNLR on topics of interest.</p> |
| 389 | YNLR (March 4, 2023) | EIS Executive Summary, p. 59 | Comment #28, Appendix A: While the overall direct footprint of the Project is relatively small, YNLR maintains that any wildlife habitat destroyed or altered by the Project should be more than offset or compensated for in some fashion. One example would be the additional disturbance created by the proposed Highway 914 extension. This needs to be accounted for by Denison. | <p>To be clear, Denison's proposed Project does not require any extension to the existing Highway 914. There is a Highway 914 extension project under evaluation by the Ministry of Highways, but this project is not related to or ancillary to the Wheeler River Project.</p> <p>As noted in response to other comments, through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. Additional detail regarding the Caribou Mitigation Plan is also provide in the memo that is attached to this comment disposition table regarding the Project-specific cumulative effects assessment (CEA).</p> <p>It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p>No other specific needs for "offset" have been identified based on the effects assessment.</p> |
| 390 | YNLR (March 4, 2023) | EIS Executive Summary Monitoring Programs, p. 74 | Comment #30, Appendix A: YNLR expects to be included as part of the design and implementation of all monitoring programs. All such programs should be transparent, arm's length, include significant | Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the |



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| | | | involvement and participation of Indigenous People, communities, and organizations and be statistically robust. | Communities of Interest will be sharing information in an agreed-upon fashion. Denison expects that important country foods harvested for food and cultural purposes (e.g., moose, fish, etc.), surface water quality, and other areas of interest will form parts of these monitoring programs, including other areas of potential concern as they evolve over time. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. |
| 391 | YNLR (March 4, 2023) | EIS Executive Summary, p. 76 | <p>Comment #31, Appendix A: The EIS states: "On the basis of the Project information and related evaluation and assessment of effects, Denison believes that the Project can be constructed, operated, and decommissioned in a manner that is not likely to cause significant adverse effects to the biophysical or human environments."</p> <p>This is perhaps an overly optimistic conclusion. However, YNLR is willing to discuss how the company moves forward and is interested in creating more formal processes to achieve this, such as the signing of an impact benefit agreement.</p> | Denison notes YNLR's perspective on this. |
| 392 | YNLR (March 4, 2023) | Section 1.0 Project Introduction and Overview, p. 1-1, 1-5 and 1-18 | <p>Comments #32 and 33, Appendix A: The Project is located within Nuhenéné and of principal concern to YNLR is that the Project be fully sustainable with respect to cultural rights and traditions, socioeconomic equity, and environmental protection. To achieve this end, YNLR expects Denison to work collaboratively with the people of Nuhenéné through the YNLR office.</p> <p>YNLR supports the sustainable mining of uranium within Nuhenéné.</p> | In March 2019, Denison was notified by the YNLR that the Indigenous communities within the local Athabasca communities identified were interested in the Project and that YNLR held the Duty to Consult from these communities. Since receiving correspondence from the YNLR office in 2019 Denison has been collaboratively working with the Nuhenéné through the YNLR office in a mutually agreed upon manner and will continue to do so. |
| 393 | YNLR (March 4, 2023) | Section 8.0 Aquatic Environment, p. 8-38 | Comment #34, Appendix A: The EIS recognized that the utilization of water will result in an adverse impact on the drainage but dismissed the issue given that a reduction in the stream flow rate is expected to be less than 3%. It would therefore be prudent to closely monitor the flow regime to identify possible adverse effects throughout the life of the Project. | In the draft EIS, conservative estimate of water taking would result in a reduction of flow of about 3% at times of low flow and the lake level could change by 1cm. While this incrementally small change in water quantity is beyond the ability of monitoring techniques to practically measure, Denison will conduct hydrological monitoring. Monitoring will likely include streamflow and lake level monitoring as well as continuous monitoring with stage dataloggers with details of monitoring plans to be finalized to support Project permitting and licensing. |

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| 394 | YNLR (March 4, 2023) | Section 8.0 Aquatic Environment, p. 8-40, 8-42, 8-98 and 8-99 | <p>Comment #35, Appendix A: Utilizing the extent of the LSA and the fact that it does not overlap with projects located within the same drainage system seems to be quite arbitrary and convenient. By this criterion, each mine does not trigger a cumulative effect according to the EIS, although they are all additive to the water flow regime. This methodology then arbitrarily and conveniently determines that "mitigation measures" for each of the mines is not warranted since there was a determination of no cumulative effects in sections 8.1.7.1, 8.1.7.2, 8.1.7.3 and 8.1.7.4.</p> <p>Comment #36, Appendix A: The determination of Cumulative Effects Characterization and the resultant Determination of Significance is highly subjective, therefore a much more extensive monitoring program is required. Such a program should start prior to the construction phase and carry on at least several years into the operation portion of the Project to at least demonstrate local and cumulative effects of mining projects within the watershed.</p> <p>Comment #37, Appendix A: YNLR agrees that the hydrological monitoring program remain throughout the life of the Project but as per the above, the study should have a much broader mandate in order to measure local and regional effects on VCs.</p> <p>Comment #41, Appendix A: YNLR is concerned that the conclusion that the residual effects from Project operations will not have an adverse effect on surface water is highly speculative. Again, this indicates the need for a comprehensive monitoring program to validate the speculation on water quality with rigorous statistical evidence.</p> <p>Comment #42, Appendix A: YNLR questions the logic track that states, "additional mitigation measures not warranted" because of the determination of no cumulative effects, then "a determination of significance is not warranted" as no cumulative effects were identified for water quality because surface water impacts are</p> | <p>In terms of watersheds and nearby uranium operations, only Key Lake Operation's drainage area interacts with the Wheeler River Project. Drainages from both operations would combine at Russell Lake. As such, the Key Lake Operation was included as an existing project in the CEA sections of the aquatic environment. The drainages associated with McArthur River Operation and Cigar Lake Operation are separate from the Project.</p> <p>The RSA is the area that surrounds and includes the LSA, and was established to assess the potential, largely indirect effects of the Project, as well as other activities, in a regional context. The RSA is large enough to capture the extent of potential effects (i.e., zone of influence) on a VC and defines the area within which cumulative effects may occur (i.e., cumulative effects assessment boundary). The RSA for the Surface Water Quality VC is bounded by the regional watershed area in which the Project Area is located. The RSA for this assessment is based on the whole watershed within which the Project is located and extends downstream to include Russell Lake (refer to draft EIS Figure 8.2-3). Given the very low magnitude of predicted changes in water quantity in the LSA (in the draft EIS, conservative estimate of water taking would result in a reduction of flow of about 3% at times of low flow and the lake level could change by 1cm), it would not be measurable further downstream into the RSA.</p> <p>The CEA considers whether residual adverse effects of the Project on a given VC will overlap spatially and/or temporally with the same residual adverse effects on the VC resulting from other past, present, and reasonably foreseeable projects or activities. The CEA follows standard methodology as per provincial (e.g., Guidelines for an Environmental Assessment) and federal guidance (e.g., Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012).</p> <p>Cumulative effects assessment is important to Indigenous communities in general because incremental effects to the environment can weaken resource economies, affect important resources such as plants, fish, and wildlife, affect rights-based and cultural activities, and affect both the health of wildlife and humans. Indigenous perspectives can be complementary to the CEA for the Project, and Denison acknowledges the important relationship of the Indigenous Communities of Interest to the lands and waters. The Indigenous Communities of Interest of ERFN and the Kineepik Métis Local #9 at</p> |

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| | | | <p>expected to remain localized...for all the mining operations in the region. Impacts on water quality and</p> <p>mitigation measures “not warranted” should be demonstrated through field studies and</p> <p>research rather than relying on a theoretical modelling approach.</p> | <p>Pinehouse (KML) have shared their Indigenous Knowledge on past, present, and predicted cumulative effects through the following:</p> <ul style="list-style-type: none"> • Wheeler River Project – Summary of Health and Socio-Economic Study Results (ERFN and SVS 2022a); • Wheeler River Project - Summary of Traditional Knowledge Study Results (ERFN and SVS 2022b); • Kineepik Valued Ecosystem Components – KML Pre-statement for Denison EIS (KML and NVP 2022); and • Response to the Environment Impact Assessment For the proposed Ministry of Highways 914 Extension Project (KML and Limnos Environmental 2022). <p>These perspectives on cumulative effects have been summarized in Section 3.4.8 of Section 3. Denison and the Communities of Interest agreed on the high value of this contribution being part of the EIS.</p> |
| 395 | YNLR (March 4, 2023) | Section 8.0 Aquatic Environment, p. 8-92, 8-93 and 8-96 | <p>Comment #40, Appendix A: There are several comments in the EIS that recognize the potential for a negative effect on water quality from the site water management system into Whitefish Lake. Statements taken from residents have identified concerns about the release of elements such as “mercury” because of the mining activity. While the report recognized that detectable concentrations of mercury will not be produced, the local comment should be considered as a proxy for a variety of contaminants such as selenium, arsenic, cobalt, zinc, etc., as well as the concern expressed by residents, rather than being taken literally as mercury as the only contaminant of concern.</p> <p>YNLR reiterates that concerns about water quality are warranted given that the EIS indicates that there will be a continuous (year-round) average discharge of water from the mine site of more than 36,000 litres/hour for the entire life of the Project. This discharge will be especially evident during low flow periods.</p> | <p>The comment from YNLR references text in Section 8.2 of the draft EIS which is the water quality assessment. Please refer to draft EIS Section 8.1 for the water quantity assessment and information on potential changes in water flow.</p> <p>Denison acknowledges the concern raised by YNLR and believes the water quality assessment, including the assessment of potential water quality effects on ecological and human health, presented in the EIS and supporting documentation is robust and supports the conclusions drawn. With regard to YNLR's concerns around contaminants in treated effluent, we refer YNLR to Appendix 10-A Environmental Risk Assessment (ERA) for Wheeler River. The ERA predicts and assesses the risk to representative human and ecological receptors resulting from exposure to radiological and non-radiological substances expected to be released throughout the Project Phases. The ERA encompasses a human health risk assessment (HHRA) and an ecological risk assessment (EcoRA), which have been prepared to be compliant with Canadian Standards Association Group (CSA) N288.6-12 Environmental Risk Assessments for Class I Nuclear Facilities and Uranium Mines and Mills (CSA, 2012). It also meets the requirements for an ERA outlined in Section 4.1 of Regulatory Document 2.9.1, Environmental Principles, Assessments and Protection Measures (CNSC, 2020). The ERA has been developed with current science and current regulatory attitudes in mind. The predicted radiological and non-radiological to human and ecological receptors demonstrate that the</p> |



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| | | | | Project can be conducted in a manner that is protective of human and ecological health. |
| 396 | YNLR (March 4, 2023) | Section 8.0 Aquatic Environment, p. 8-102 | Comment #43, Appendix A: While appreciating current water quality standards, YNLR suggests that monitoring programs be designed to more than meet regulatory requirements of the license conditions. The EIS recognizes that the Project area lies primarily within an undisturbed area of the boreal forest (aside from the extent of seismic activity carried out within this area). YNLR would like to be involved in specific follow-up and monitoring plans as identified in the EIS. | <p>As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." The monitoring and follow-up program will include measurement of water quality parameters to meet regulatory criteria (i.e., provincial discharge permits, Metal and Diamond Mining Effluent Regulations [MDMER; Government of Canada 2022] and CSA N288.4-19 (CSA Group 2019). At a minimum, this will include collection of non-radiological parameters (e.g., metals, nutrients, hardness, temperature, pH, TDS, TSS, and sulphate) and radiological parameters.</p> <p>Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.</p> <p>Additionally, regulators will be involved with setting specific requirements for follow-up and monitoring, as well as reporting, through licence conditions (CNSC) and provincial approvals. A number of monitoring and reporting requirements will be generated through the completion of the environmental assessment process. Denison and its lifecycle regulators will be in regular communication throughout the life of the Project as part of routine reporting, site inspections, licence and permit renewals. Denison is committed to ongoing engagement with regulators and recognizes that this will include information sharing related to follow-up and monitoring results and any needed adaptive management plans. It is also noted for further reference</p> |



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| | | | | that there are existing, non-Denison monitoring programs such as the CNSC's Independent Environmental Monitoring Program (https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-facilities/iemp/index.cfm), and the Eastern Athabasca Regional Monitoring Program (www.earmp.ca/). Results from these programs provide relevant information and can complement Denison's Project-specific monitoring program. One forum for discussion of monitoring results is the Northern Saskatchewan Environmental Quality Committee (https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis-and-northern-initiatives/northern-Saskatchewan-environmental-quality-committee). |
| 397 | YNLR (March 4, 2023) | Section 8.0 Aquatic Environment Fish and Fish habitat, p. 8-117, 8-140, 8-141, 8-153, 8-252 and 11-50 | <p>Comment #44, 45, 46, 49, 52 and 84, Appendix A: It is noted that the aquatic survey and fish sampling were carried out in 2016, which is now somewhat dated.</p> <p>It is also noted that work that would affect fish and fish habitat could/should only be carried out between July 16 and September 30th, as both spring and fall spawning species were collected in the fish sample.</p> <p>YNLR acknowledges that the amount of fish habitat directly affected by the Project is small. However, a much bigger concern is the indirect effects of increased human activity in the area over several decades and beyond, particularly with respect to the consequent increase in fish harvest. This will directly affect the ability of Indigenous Peoples to exercise their Aboriginal and Treaty rights.</p> <p>Related comments:</p> <ul style="list-style-type: none"> YNLR would be eager to see how "a fish salvage plan to relocate fish prior to in-water works" might be carried out? Such an approach may not be practicable or effective. While the sentiment of the above fish management strategy is laudable, it is not practical in terms of preserving fish numbers given the increased human access to the lakes that the mining activity will create. The EIS does recognize the value of sucker species to residents, which is a positive step, as these fish species are | <p>The response to the review comment are organized by theme, consistent with the comment.</p> <p><u>Fish salvage</u>: Details of a fish salvage program, if required, will be developed to support Project permitting and licensing. Briefly, for any in-water work, the work area would be isolated from rest of the waterbody. Any fish remaining inside the isolated work area would be captured and relocated outside of the work area. Based on the experience of Denison and its SME team it is noted that such programs are implemented successfully on a routine basis with effective and site-specific planning.</p> <p><u>Indirect effects related to increased human activity in the area</u>: Please note that the Project will not change public access to the area. The existing gate on Highway 914 near Cameco's Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project. The proposed operation is fly-in, so Project related traffic to the area would only be related to deliveries of materials to and from the site. On-site staff will not have access to personal (or company) vehicles and will largely be "confined" to the camp and work areas during their shifts. Section 11 of the draft EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders.</p> <p><u>Recreational fishing</u>: As described in the draft EIS and as noted above, workforce members will be transported to/from site via a fly-in/fly-out</p> |

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| | | | <p>netted for a variety of purposes. Increased local traffic will also undoubtedly provide more access for both subsistence and recreational fishing. As part of the mitigation measures YNLR proposes working with authorities to regulate recreational fishing prior to the onset of the construction phase of the Project and revisiting these regulations at intervals throughout the mine's operation and decommissioning.</p> <ul style="list-style-type: none"> • YNLR disagrees with the assumptions used (Section 8.3.7.2 to 8.3.7.5), which "assume" specific monitoring and follow-up for Fish and Fish Habitat related to cumulative effects is not warranted. • YNLR would like to be involved in designing and carrying out of a monitoring program, which would test the "no cumulative effect" assumption. • YNLR would like to be involved in a monitoring program for fish health. Further, this monitoring program should continue for the life of the Project or until it is demonstrated that the current filtering programs are effective. | <p>rotation and will, therefore, not use ground travel options during shift changes, which will eliminate fishing on local lakes during commutes to/from the site and during time off work. Denison site vehicles will not be available for recreational purposes. While at the Project site and off duty, workers may opt to fish local waterbodies. To protect sustainable use of resources, only catch and release of fish will be encouraged, and fish storage or cooking facilities will not be provided. To prevent entry of land users from entering the Project Area, Denison will control access to the property with both a north and south security gate. Overall, given a lack of resources to access fishing locations and store fish harvests, workforce fishing is expected to cause minimal disturbances to local users.</p> <p><u>Monitoring:</u> In the draft EIS, Denison outlines its plans to conduct fish health monitoring in tandem with surface water quality, sediment quality, benthic invertebrate and fish and fish habitat sampling. Sampling locations will be co-located to facilitate comparison to water quality and sediment quality characteristics. Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries are sufficiently extensive to measure EIS predictions. Denison is committed to maintaining positive relations with all local interested parties and will be open to discussions on any issues or concerns that arise.</p> |
| 398 | YNLR (March 4, 2023) | Section 8.0 Aquatic Environment, p. 8-151 | Comment #47, Appendix A: The statement on page 8-151 recognizes that the discharge of treated effluent during the Operation and Decommissioning phase may interact with Cameco's current releases contributing to cumulative effects. | The requested information is presented in draft EIS Section 8.2.7 Cumulative Effects (surface water quality). The summary referenced in the YNLR comment is made in Section 8.3 Fish and Fish Habitat. Specific monitoring and follow-up plans for the Surface Water Quality VC will be prepared to refine and finalize the approach and specific metrics following consultation |

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| | | | It is recommended that a study be undertaken to assess the basin effect of water discharges. | with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC-specific program. |
| 399 | YNLR (March 4, 2023) | Section 8.0 Aquatic Environment, p. 8-152 | <p>Comment #48, Appendix A: Sediment quality of Whitefish Lake and downstream is not "anticipated" to overlap with the Key Lake Operation.</p> <p>It would be prudent to test this hypothesis to ensure that water quality in the flowage is maintained given the high value placed on these waters by residents.</p> | Any changes in sediment quality would be preceded by changes in surface water quality. Should the surface water quality monitoring program identify changes beyond those predicted in the EIS, adaptive management measures would be implemented and may include monitoring of sediment quality further downstream in the watershed. In addition, the Environmental Effects Monitoring (EEM) program under the Diamond Mining and Effluent Regulations will provide a framework for monitoring changes in the aquatic environment. |
| 400 | YNLR (March 4, 2023) | Section 8.0 Aquatic Environment, p. 8-232 | <p>Comment #51, Appendix A: Water management during construction indicates that there is to be no planned discharge to Whitefish Lake.</p> <p>If a release of water from the mine site becomes necessary, in addition to monitoring suspended solid levels, there should be a communication plan to inform area residents of the pending release and its duration.</p> | <p>During Construction, no effluent is expected to be released to the aquatic environment. Contact water stored in the Clean Waste Rock Pond during Construction will be held onsite until the Industrial Wastewater Treatment Plant (IWWTP) is commissioned. At that time the water from the pond would be conveyed to the IWWTP, treated, and released to Whitefish Lake per permit / license requirements. The sequencing of Construction activities will occur in a logical manner based on Project execution plans. For example, construction of the wellfield runoff pond will be prioritized during the early part of Construction, and it will be able to hold 38,200 m3 of water. This will provide contingency and additional water storage capacity if contact water produced exceeds estimates or the volume available in the Clean Waste Rock Pond. Other secondary contingency measures are also available should the volume of water requiring management exceed site infrastructure storage volume. Depending on the situation and volume of water needing management, this could include for example use a hydrovac for offsite disposal. Alternatively, in the instance that there is a planned release of water during construction, this would be permitted by Saskatchewan Ministry of Environment.</p> <p>In accordance with our Indigenous Peoples Policy, Denison is committed to collaborating with Indigenous peoples and communities to build long-term, respectful, trusting, and mutually beneficial relationships. Denison has identified key objectives respecting Indigenous engagement associated with the Project:</p> <ul style="list-style-type: none"> • Build and maintain authentic relationships based on a foundation of trust, good faith, and transparency. |

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| | | | | <ul style="list-style-type: none"> Create a respectful dialogue process that promotes communication and collaboration among Denison and Indigenous communities, in a timely and accurate fashion. Understand how the proposed development of the Project may affect the interests of Indigenous peoples (including Indigenous and/or Treaty Rights), and work with Indigenous peoples to avoid, mitigate, or otherwise address effects, while also collaborating to maximize potential positive effects. <p>In addition, Denison is required to have a Public Information Disclosure Protocol as set out by the CNSC. This would include any notification to the wider public of unplanned discharges.</p> |
| 401 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment Fig 9. 2-6, p. 9-83 | <p>Comment #53, Appendix A: YNLR is concerned about the potential residual and cumulative effects of the extensive seismic network on the soils of the RSA and LSA.</p> <p>Were these and other potential network effects considered in the analyses?</p> | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |
| 402 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment Appendix 9B, p. 60 Also, p. 9-68, Fig 9. 2-9, 9-133, 9-139 and 9-149 | <p>Comment #54 and 55, Appendix A: Appendix 9B of the EIS states that 100% of the LSA and 82% of the RSA are already disturbed by buffered anthropogenic disturbances in the form of exploration lines, exploration trails, and seasonal roads. During the consultation process, residents raised the issue of the high degree of human disturbance and highlighted concerns about the broad network of linear disruptions in numerous places across the EIS.</p> <p>As with the Project soils, YNLR is concerned about the potential residual and cumulative effects of the extensive seismic network on the vegetation and wetlands of the RSA and LSA, particularly from edge effects. Were these and other possible effects of the network considered? If so, how were they included?</p> | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |
| 403 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment, p. 9-168 | Comment #56, Appendix A: Wilson et al. (2018) recently summarized the home ranges of 25 woodland caribou populations in Canada. The average home range varied 28-fold, from 312 to 8,838 sq. km. | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: |

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| | | | The RSA delineated for assessing cumulative effects on caribou (40,174 ha ~ 402 sq.km.) is thus inadequate for this purpose, and the conclusions of project residual and cumulative effects non-significance are highly suspect. The same could be said for other wide-ranging species such as wolverine. | Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |
| 404 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment Fig 9. 2-9 | Comment #57, Appendix A: Was the current RSA anthropogenic disturbance estimate (599 ha) inclusive of the many kilometres of existing seismic cut lines? Did the estimate include consideration of the compounding 'edge effects' from these linear disturbances? If not, why not? See previous comments on the very high level of existing human disturbance in the LSA and RSA highlighted in Appendix 9B. | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |
| 405 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment, p. 9- 239 | Comment #58, Appendix A: Again, the direct and indirect effects of the existing seismic disturbance seem not to have been considered in this assessment, particularly because wolverines 'avoid linear infrastructure.' In fact, one can also see that woodland caribou avoid areas of historic seismic disturbance by directly comparing the figures on page 9-139, EIS (vegetation) and 9-202, EIS (caribou sightings). Appendix 9B gives a summary of the impacts of linear disturbances on boreal forest wildlife. | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |
| 406 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment, 9. P- 239 | Comment #59, Appendix A: Buffered disturbance is included in Appendix 9B but appears to have been ignored in the effects assessment. Was the 500m buffering of anthropogenic disturbances also applied to the network of seismic cut lines to account for edge effects? If not, why not? | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |
| 407 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment Table 9.3-23 and p. 9-270 | Comment #60, Appendix A: Is the amount of initial 'available woodland caribou habitat' inclusive of the direct and indirect seismic cutline network effects? If not, why not? Irrespective of this, it appears that the LSA is being written off for woodland caribou for decades to come. See above comments with respect to Appendix 9B. | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |
| 408 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment, | Comment #61, 62, 82, 83, Appendix A: The EIS correctly highlights the cultural importance of moose and woodland caribou to Indigenous People, which underscores YNLR's | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and |

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| | | p. 9- 275, 9-280, 9-300, Section 11.0 Land and Resource Use, p. 11- 46 and 11- | <p>concerns regarding the conclusions of the residual and cumulative effects assessments of these species, particularly for caribou.</p> <p>YNLR questions the optimistic conclusions drawn by Denison regarding the ongoing availability of woodland caribou for traditional use.</p> <ul style="list-style-type: none"> The buffered direct habitat loss alone eliminates the LSA and RSA for caribou habitation for decades to come (Appendix 9B), so how can it 'sustain the regional woodland caribou population' in any way? The reference to 'proven' mitigation measures is rather vague and requires further explanation. YNLR is unaware of these proven mitigation measures, other than isolation from human disturbance. YNLR disagrees with this overall residual effects conclusion for these wildlife VCs, especially in regard to woodland caribou (Appendix 9B), for the following reasons: <p>(i) Comment #64, Appendix A: In addition, the reason why SK1 holds one of the very few sustainable caribou populations despite a high level of forest fire, is because of currently very low levels of human intrusion, which suggests that the provincial and federal approval processes, BMPs, and mitigation measures have not been sufficient in the rest of the species' range throughout the entirety of Canada.</p> <p>(ii) Comment #83, Appendix A: Woodland caribou populations have strongly declined across Canada despite all types of project mitigation, so YNLR doubts that similar mitigation efforts will be effective here. A woodland caribou 'management' plan is not sufficient. YNLR believes that, at a minimum, Denison should commit to an aggressive caribou habitat offset plan before work on the Project begins. In addition, it is unclear what constitutes this proposed mitigation. A caribou management plan is proposed (Section 9), however nothing short of a full caribou habitat offset plan will suffice to sustain the region's population. Offset activities should include the ongoing restoration of the existing seismic lines, among</p> | complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |

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| | | | other things. This work is best accomplished in consultation and collaboration with Indigenous People, their communities, and organizations. | |
| 409 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment, p. 9- 280, 9-287 and 9-302 | <p>Comment #62, 63, 64, 66, 67 and 68, Appendix A: Past and future direct and indirect effects of seismic line clearing appear to have been ignored in this assessment (Appendix 9B). The fact that most caribou sightings occurred away from seismically disturbed areas independent of habitat type supports this observation.</p> <p>YNLR disagrees with this overall residual effects conclusion for these wildlife VCs, especially in regard to woodland caribou (Appendix 9B), for the following reasons:</p> <ul style="list-style-type: none"> • Comment # 63 and 64, Appendix A: The extent of past seismic line cutting is very high for both the LSA and RSA. However, direct and indirect (edge) effects on wildlife, especially woodland caribou, seem to have been overlooked or minimized. Future exploration disturbance should have been estimated and included based on the rate of historic disturbance if nothing else. • Comment #67, Appendix A: Most of these mitigation measures (listed on p. 9-308) are quite superficial and would contribute little to the long-term conservation of wildlife in the RSA and LSA. The proposed caribou management plan needs to be a fully developed Caribou Habitat Offset Plan given the extent of already altered habitat by seismic activities. Also note that this has a high potential for a direct impact on Aboriginal and Treaty rights. More, some Indigenous People will likely take offence at the idea of the company 'facilitating access' to their inherent Treaty Rights. Significant consultation and collaboration with Indigenous People is required. • Comment #69, Appendix A: Concern about the extensive network of seismic cut lines were also raised by Indigenous People at several places in the EIS. | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |

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| 410 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment | <p>Comment #65, Appendix A: Is it not possible to conduct modern mineral exploration without cutting miles and miles of seismic lines across the boreal forest?</p> <p>Denison, as a progressive company, will consider advances in technology</p> | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |
| 411 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment | <p>Comment #68, Appendix A: Section 9.3.9 of the draft EIS indicates that with the implementation of the above (and additional) mitigation measures, the residual effects on the Ungulates, Furbearer, and Woodland Caribou VCs were assessed as follows:</p> <ul style="list-style-type: none"> • Moose. Not significant: the residual effects of alteration and/or loss of available habitat and of change in mortality are not expected to result in a change that will alter habitat integrity to the point where it would not be able to sustain the regional ungulate populations or the integrity of the regional moose population to the point where it could not be sustained. • Furbearers. Not significant: the residual effects of alteration and/or loss of available habitat and of change in mortality are not expected to result in a change that will alter habitat integrity to the point where it would not be able to sustain the regional furbearer populations or the integrity of the regional furbearer populations to the point where they could not be sustained. • Woodland caribou. Not significant: the residual effects of alteration and/or loss of available habitat and of change in mortality are not expected to result in a change that will alter habitat integrity to the point where it would not be able to sustain the regional woodland caribou population or the integrity of the regional woodland caribou population to the point where they could not be sustained. <p>YNLR believes this summary to be overly optimistic and somewhat inaccurate for the following reasons:</p> | Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. |

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| | | | <ul style="list-style-type: none"> The RSA and LSA are too small relative to the home range of woodland caribou to serve as a basis for assessing residual and cumulative effects on the species. Large portions of the RSA and LSA have been badly degraded by mineral exploration activities (particularly by line-cutting for seismic surveys; Appendix 9B), yet their direct and indirect (edge) impacts seem not to have been considered in the effects assessments. This is puzzling given the known impact that these features have on wildlife, especially caribou, wolverine, other predators, and many avian species. The EIS maps themselves clearly show an avoidance of these seismically-disturbed areas by woodland caribou. <p>YNLR strongly believes that, at a minimum, an aggressive Caribou Habitat Offset Plan should be co-developed before Project work begins, and regular monitoring of the caribou population be conducted throughout the life of the Project.</p> | |
| 412 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment, p. 9- 320, 9-384, 9-389, 9-408, 9-413, 9-414, 9-454, 9-457, 9-460, 9-465, 9-469 Section 11.0 Land and Resource Use | <p>Comment #69, Appendix A: in Section 9.4 of the EIS lists Raptors, Migratory Breeding Birds and Bird Species at Risk together (p. 9-320).</p> <p>YNLR questions how and why these three avian VCs were selected and grouped.</p> <p>The three VCs include dozens of breeding bird species with hugely varying habitat requirements, so it is difficult to see how it is possible to accurately predict Project effects for many of these species, especially when so many are lumped together in only one Migratory Breeding Birds VC. In addition, the scarcity of raptors and avian species at risk makes them poor candidates for effects assessments because of low sample sizes.</p> <p>Comment #72 and 73, Appendix A: With only two water-based species selected to represent all forest raptors in the Project area, the results and conclusions of this assessment are extremely limited. For the forest birds in particular, this is compounded by the non-inclusion of the historic network of</p> | An EIS requires scoping in order to determine the appropriate content for the assessment and focus the EIS on key areas of concern and relevance. As per standard, accepted EA practice, the EA was organized by and focused on VCs. The VCs are aspects of the biophysical and human environments that will likely be affected (adversely or positively) by the Project. The VCs reflect identified scientific, local knowledge and Indigenous knowledge, and community interests regarding the Project and its potential effects and are typically identified early in the EA process as a result of questions and concerns raised through engagement with government departments and agencies, Indigenous and community groups, and the general public. Key Indicators are an important component or aspect of the VC that is expected to be affected (changed) as a result of the Project. The KIs may comprise subsets or a guild of the VC, certain aspects of the VC that may be affected by the Project and/or which have a particular importance. The three avian VCs (with Key Indicators in brackets) were: Raptors (bald eagle and osprey), Migratory Breeding Birds (waterbirds and waterfowl, upland game birds, and migratory songbirds), and Bird Species at Risk (common nighthawk, short-eared owl, yellow rail, rusty blackbird, and olive-sided flycatcher). The residual effects evaluation was completed on the Key Indicator species. The |

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| | | | <p>seismic cut lines across the landscape (Appendix 9B), and the resulting underestimation of direct and edge effects.</p> <p>Comment #74, Appendix A: Species at risk generally make very poor indicators of ecological integrity/biodiversity because of their relative scarcity. In fact, three of the VC bird species at risk selected were not even detected during the Project surveys. This very low quantity and data quality greatly weakens any conclusions regarding the Project residual effects.</p> <p>Comment # 75, Appendix A: YNLR cannot find any mention of the extensive seismic line network impacts (Appendix 9B) included in the effects assessment for birds. This was also the case for the caribou and wildlife assessments.</p> <p>Comment #76 and 77: Appendix A: The selection of weak indicators and the ad hoc grouping of dissimilar species make these predictions quite unreliable. This potential error is likely compounded by the apparent exclusion of the direct and indirect effects of the existing seismic cutline network (Appendix 9B). Concern about these extensive network of seismic cut lines were also raised by Indigenous People at several places in the EIS.</p> | <p>rationale for selecting these avian Key Indicators is available in Section 9.4.1.2. For instance, the inclusion of Species At Risk birds is a requirement of the Species at Risk Act and the CNSC's REGDOC 2.9.1 also notes that applicants should identify all biological species at risk in the area; the avian Species at Risk were not included in the EIS to be indicators of ecological integrity/biodiversity.</p> <p>The avian effects assessment was habitat based. The assessment methods used a conservative approach with the assumption that, following the implementation of site-specific mitigation measures, the proposed Project activities would have a residual effect on these species' guilds regardless of species presence on site. As described in the EIS, pre-construction surveys will be conducted prior to the commencement of any vegetation clearing or soil disturbance. Avian species will also be routinely monitored throughout the life of the Project. Results from the surveys and monitoring activities are expected to inform the adaptive management process to update Project design and identify the need for additional mitigation measures, if required. Denison is of the professional opinion that the data presented, and analysis provided in the avian assessment of the draft EIS is sufficient given 1) the local / regional environment, 2) the level of interaction of the Project with birds that is expected, and 3) because bird densities are not expected to be limited by habitat regionally.</p> <p>Please also refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments for a discussion of how existing cutlines were considered in avian assessments. All past anthropogenic disturbances (which includes cutlines to support mineral exploration) were considered in the terrestrial environment assessments. These human disturbances were mapped and considered/addressed appropriately in Section 9 including the Existing Environment, Residual Effects Characterization, and Cumulative Effects Assessment sections, as they relate to Terrain, Soil and Organic Matter/Peat (Section 9.1); Vegetation and Ecosystems, Listed Plant Species and Wetlands (Section 9.2); Ungulates, Furbearers and Woodland Caribou (Section 9.3); Raptors, Migratory Breeding Birds, and Bird Species at Risk (Section 9.4). The cutlines were classified as previously disturbed and considered as low-quality habitat or no habitat, depending on the species being assessed and their habitat requirements. An anthropogenic layer is included on draft EIS, Figure</p> |

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| | | | | 9.2-6, which includes geophysical cutlines. Please note that anthropogenic features were mapped at IKONOS 1:5,000. This anthropogenic layer is not listed under available habitat types for any of the wildlife or avian VCs in subsequent assessments (e.g., Figures 9.3-9 to 9.3-14, Figures 9.4-8 to 9.4-11, Figures 9.4-13 to 9.4-15) except for Common Nighthawk (Figure 9.4-12), which is a species that is known to use anthropogenic features. |
| 413 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment, p. 9- 356 and 9-357 | <p>Comment #71, Appendix A: The EIS states: "In this assessment, alteration of habitat is defined as indirect habitat alteration where suitable habitat for the Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs and their associated KIs remains physically intact but is rendered less suitable or unsuitable for their use. Sources of habitat alteration include Project-related habitat fragmentation (i.e., the breaking apart of continuous habitat into smaller, spatially distinct patches), edge effects (i.e., the influence of recently cleared areas on adjacent habitats), and sensory disturbance." (Page 9-356, EIS)</p> <p>"A minimum patch size is often required to fulfill all required life requisites (Robbins et al. 1989, Askins 1994, Vance et al. 2003, Butcher et al. 2010). When available suitable habitat is below a minimum patch size threshold, individual birds may get displaced despite the continued presence of suitable habitat. As a result, patch size at the individual and population level may have a species-specific effect on habitat use and could affect reproductive success, health, and survival (Askins 1994, Villard et al. 1999, Vance et al. 2003, Suorsa et al. 2004, Butcher et al. 2010)." (Page 9-357, EIS)</p> <p>"Edge effects include the influence of recently cleared areas on adjacent intact habitats. Gradients of light intensity, temperature, wind, relative humidity, as well as snow accumulation and melt may occur along the border between cleared areas and intact habitats (Bannerman 1998, Kremsater and Bunnell 1999), which could alter habitat suitability for avian use. Bannerman (1998) suggested that the richness and density of generalist bird species may increase along forest edges based on the variety of vegetation and abundance of food (e.g., American Crow and Blue Jay. However, numbers of habitat</p> | <p>Please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments for a discussion of how existing cutlines were considered in avian assessments. All past anthropogenic disturbances (which includes cutlines to support mineral exploration) were considered in the terrestrial environment assessments. These human disturbances were mapped and considered/addressed appropriately in Section 9 including the Existing Environment, Residual Effects Characterization, and Cumulative Effects Assessment sections, as they relate to Terrain, Soil and Organic Matter/Peat (Section 9.1); Vegetation and Ecosystems, Listed Plant Species and Wetlands (Section 9.2); Ungulates, Furbearers and Woodland Caribou (Section 9.3); Raptors, Migratory Breeding Birds, and Bird Species at Risk (Section 9.4). The cutlines were classified as previously disturbed and considered as low-quality habitat or no habitat, depending on the species being assessed and their habitat requirements. An anthropogenic layer is included on draft EIS, Figure 9.2-6, which includes geophysical cutlines. Please note that anthropogenic features were mapped at IKONOS 1:5,000. This anthropogenic layer is not listed under available habitat types for any of the wildlife or avian VCs in subsequent assessments (e.g., Figures 9.3-9 to 9.3-14, Figures 9.4-8 to 9.4-11, Figures 9.4-13 to 9.4-15) except for Common Nighthawk (Figure 9.4-12), which is a species that is known to use anthropogenic features.</p> |

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| | | | <p>specialist species (e.g., Red-breasted Nuthatch and Pileated Woodpecker may decrease near edges because they use edge habitats less frequently or avoid them (George and Dobkin 2002). The potential influx of individuals into edge habitats, or the potential displacement of individuals into other areas, may increase crowding and subsequent inter-and intra-specific competition for breeding habitat, food, and other resources (Hagan et al. 1996, Schmiegelow et al. 1997, Bannerman 1998, George and Dobkin 2002, Calizza et al. 2017).” (Page 9-357, EIS)</p> <p>The above descriptions summarize the potential effects of the Project on breeding bird habitats. When wooded landscapes are subjected to widespread seismic activity, the same effects occur: continuous parcels of forest are divided by miles of cut lines, resulting in smaller habitat patches and greater habitat edge. As a result, bird species that prefer contiguous habitats are declining, while birds that prefer habitat edges are increasing.</p> <p>How will the EIS address already existing direct and indirect impacts of these historic seismic linear disturbances across the LSA and RSA (Appendix 9B) that were ignored.</p> | |
| 414 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment | Comment #78, Appendix A: Why were amphibians excluded as a VC/KI? Bats? Both were surveyed (Appendix 9B). | Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS and has been included in the response to YNLR (a new SAR appendix (new Appendix 9-D) will be added to Section 9 of the final EIS. It has been included here as Attachment IR-131). This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on bats and amphibians. |
| 415 | YNLR (March 4, 2023) | Section 9.0 Terrestrial Environment, p. 9-474 | Comment #79, Appendix A: Project monitoring programs specific to Raptors, Migratory Breeding Bird, and Bird Species at Risk VCs are critical, particularly the ongoing repeated surveys throughout the life of the Project, especially given the weak | The framework for avian-related monitoring programs are available in Section 9.4.8 of the draft EIS. This includes a discussion of the anticipated adaptive management process. As described in the draft EIS, a wildlife monitoring plan will be developed to support permitting and licensing and implemented as |

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| | | | predictive basis for the effects assessments of the Project on breeding bird species. | the Project proceeds. The wildlife monitoring plan will provide details on the monitoring and follow-up programs outlined in Section 9.4.8 of the draft EIS. |
| 416 | YNLR (March 4, 2023) | Section 11.0 Land and Resource Use | Comment #80, Appendix A: YNLR would like to emphasize that natural resource use by Indigenous Peoples of northern Saskatchewan is of incalculable value, and the Project must not infringe upon the ability of Indigenous Peoples to exercise those constitutionally protected rights. | Denison acknowledges the comment. We believe that the work we have done to date with the YNLR, such as entering into an Exploration Agreement in respect of Denison's exploration activities, demonstrates our strong understanding of this YNLR emphasis. |
| 417 | YNLR (March 4, 2023) | Section 11.0 Land and Resource Use, p. 11- 50, 11- 57, 11-58, 11- 79, 11-138 and 11-139 | <p>Comment #84, 87, 88 and 89, Appendix A: The EIS notes that "The presence of the Project workforce will increase the numbers of people in the ILRU LSA by an estimated 300 during Construction and 180 during Operation and Decommissioning." (p. 11-57)</p> <p>YNRL notes that:</p> <ul style="list-style-type: none"> This is a significant increase in the number and persistence of humans in the area, and despite these vague reassurances, YNLR believes that this increase will affect the ability of Indigenous Peoples to exercise their Aboriginal and Treaty rights and increase the pressures on the natural resources of the area. YNLR believes that Denison provides an overly optimistic conclusion regarding the impacts of the Project on traditional resource use by Indigenous peoples. One indicator of increased human activity is truck traffic. However, these numbers do not include non-truck traffic. How will Denison address this? <p>As with the impacts on the traditional use of land and natural resources by Aboriginal and Treaty rights holders, the human presence in the region is going to increase, which in turn will put additional pressures on fish and wildlife resources.</p> | <p>Section 12.3.3.2.1 of the EIS describes how access north of the Key Lake gatehouse for employees of northern mines, Indigenous resource harvesters from select communities, cabin owners, and lease owners provides for controlled access to users. Further, Denison staff will not be allowed to hunt or fish. Denison expects to continue to work with Indigenous COI to share information about the proposed impacts of the Project in relation to the potential to adversely impact the exercise of hunting, fishing, trapping and the carrying out of traditional uses as a result of the Project. Information in this respect will be provided as an update to the EIS. Further mitigations identified in Section 12 include:</p> <ul style="list-style-type: none"> Air transportation will be used to transport most workers between the Project site and designated pick-up and drop-off points in communities. Pick-up points will be located at two locally central points in communities within the LSA, one additional site in northern Saskatchewan, and potentially other locations to minimize time spent away from families. Denison's Environment, Health, Safety, and Sustainability Policy will be enforced. Liaison with LSA communities and relevant authorities (e.g., RCMP, health and service providers) will continue. Culturally sensitive employment policies that support the Indigenous workforce will be implemented (e.g., having an Elder representative at the Project site to provide cultural programming) |
| 418 | YNLR (March 4, 2023) | Appendix 16-A Summary of Residual Effects, p. 1 | Comment #90, Appendix A: There are about three dozen Valued Component/Key Indicators that are assessed for the significance of residual effects (effects that remain after mitigation) from the Project. They include sediment quality, benthic invertebrates, fish and fish habitat, fish health, terrain, soil, organic matter, vegetation abundance, listed plant species, wetlands, ungulates | The draft EIS carefully evaluated the residual adverse effects remaining on VCs and KIs following implementation of mitigation measures. The EIS conservatively identifies where change from existing conditions are expected for each VC or KI, and assesses this change (i.e., the residual effect) for significance. For instance, the wildlife and avian assessments concluded that the residual effects of the Project are not expected to result in a change to |

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| | | | <p>(moose), furbearers (wolverine, pine marten, mink, muskrat), woodland caribou, raptors (bald eagle, osprey), migratory breeding birds (water birds and waterfowl, upland game birds, migratory songbirds), avian species at risk (5), human health and safety, Indigenous land and resource use, other land and resource use, heritage resources, traditional diet, community well-being (income and cohesion), traffic, infrastructure & services, and economics.</p> <p><u>The residual effects of the Project on all of these VCs/Kis are concluded to be non-significant in the EIS.</u></p> <p>YNLR questions this overly optimistic and statistically unlikely prediction. For example, the sheer number of fish and wildlife species that the few selected VC/Kis represent would suggest that some will be adversely affected, even if by chance alone. The assessment effectively states that the Project is advantageous and/or neutral to all biophysical and human values, which YNLR rejects. If the Project proceeds, YNLR will want to be closely associated with all project monitoring programs.</p> | <p>the viability and persistence of the VCs and associated KIs and were, therefore, predicted to be not significant. As the review comment correctly notes residual effects identified in the EIS were deemed to be not significant - that is, the level of effect (change) did not meet the threshold of significance as defined for the VC. The EIS also discusses the certainty (and uncertainty) of the conclusions drawn by the assessment. Each VC or KI is evaluated independently and based on specific Project-environment interactions and VC-specific mitigations. Denison is confident that the conclusions drawn in the EIS with respect to potential effects and their significance are supported by the analysis presented.</p> <p>Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.</p> |
| 419 | YNLR (March 4, 2023) | Appendix 16-A Summary of Cumulative Effects | <p>Comment #91, Appendix A: There are about three dozen Valued Component/Key Indicators that are assessed for the significance of cumulative effects (effects that remain after mitigation) from the Project. These include air quality, noise, terrain morphology and stability, groundwater quantity and quality, surface water quality and quantity, soil quantity and quality, organic matter, sediment quality, benthic invertebrates, fish and fish habitat, fish health, vegetation abundance, listed plant species, wetlands, moose, furbearers, woodland caribou, raptors, migratory breeding birds, avian species at risk, human health, Indigenous land and resource use, other land and resource use, heritage resources, traditional diet, income of workers, community cohesion, traffic, community infrastructure and services, and economics.</p> | <p>Please refer to the response to YNLR comments #90.</p> <p>Additionally, Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response. Accordingly, please refer to the attached memo RE: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments.</p> |

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| | | | As with the summary of the residual effects, <u>the cumulative effects of the Project on all of these VCs/Kis are concluded to be non-significant in the EIS.</u> Again, YNLR believes this to be an overly optimistic and statistically unlikely prediction for the same reasons as given above, for example, inadequate spatial boundaries, poorly chosen and grouped VCs and Kis, the apparent omission of the existing linear disturbance network in the effects assessments, and the largely qualitative nature of the assessments and their resultant 'significance.' | |
| 420 | YNLR (March 4, 2023) | Executive Summary Monitoring and Follow-Up Programs | <p>Comment #92, Appendix A: YNLR believes there is a lot of uncertainty remaining from this EIS. This stems from several items, including the relatively novel nature of the ISR methodology with its potential effects on water quality and fish health, to the questionable conclusion that the mine will be neutral with respect to the persistence of woodland caribou in the region.</p> <p>If the mine is to be approved, YNLR wants a transparent, independent, statistically robust monitoring program implemented for the life of the Project and beyond. YNLR expects northern Indigenous Peoples to be involved in the design and implementation of such a program.</p> | <p>Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries are sufficiently extensive to measure EIS predictions. Additionally, Denison has identified key objectives respecting Indigenous engagement associated with the Project:</p> <ul style="list-style-type: none"> • Build and maintain authentic relationships based on a foundation of trust, good faith, and transparency. • Create a respectful dialogue process that promotes communication and collaboration among Denison and Indigenous communities, in a timely and accurate fashion. • Understand how the proposed development of the Project may affect the interests of Indigenous peoples (including Indigenous and/or Treaty Rights), and work with Indigenous peoples to avoid, mitigate, or otherwise address effects, while also collaborating to maximize potential positive effects. |
| 421 | YNLR (March 4, 2023) | General | Comment #1, Appendix B: There is inconsistent use of YNLRO and YNLR throughout several sections of the EIS. Specifically, | Editorial issue with inconsistent abbreviations for Ya'thi Néné Land and Resource Office will be corrected in the final EIS and 'YNLR' will be used. |

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| | | | YNLRO in section 3, YNLR in sections 4 and 11. As they are used to represent the same thing, only one format should be used. | |
| 422 | YNLR (March 4, 2023) | Section 1.0 Project Introduction and Overview, p. 1-5 Section 3.0 Value of IK in EA Practice, p. 3-1 and 3-2 | <p>Comment # 2 and 6, Appendix B: EIS Page 1-1, second paragraph, first sentence states: "The Project falls within the boundaries of Treaty 10, the Nuhtsiye-kwi Benéne (Ancestral Lands) of English River First Nation, the traditional territory of the Kineepik Métis Local #9, the homeland of the Métis, and the Nuhenéné."</p> <p>YNLR notes that this is a misuse of Nuhenéné as the name of the people. This should be "Nuhenéné, the traditional territory of the Athabasca Denesųliné".</p> <p>In reference to section 3.1 of the EIS (p. 3-1 to 3-2), YNLR also notes that the Wheeler River Project falls within Nuhenéné and Athabasca Denesųliné perspectives and knowledge should have been sought throughout all stages of the Environmental Assessment (EA). Early inclusion in this project would have been beneficial to both the Athabasca Denesųline communities and to Denison through increased sharing of knowledge.</p> | At first instance of 'Nuhenéné' Denison will recognize: 'Nuhenéné, the traditional territory of the Athabasca Denesųliné.' |
| 423 | YNLR (March 4, 2023) | Section 1.0 Project Introduction and Overview, p. 1-5 and 4-12 | <p>Comment #3, Appendix B: There YNLR notes that the Hatchet Lake Denesųliné First Nation, an Athabasca Denesųliné community, is the closest to the Project. The Wheeler River EIS seems to rely on road distance rather than physical proximity.</p> <p>Road distance should not be utilized to determine community importance or impacts since not all travel methods require continuous roads. Travel to this part of our traditional territory is typically achieved cross country rather than by road.</p> <p>Comment #13, Appendix B: YNLR notes that Hatchet Lake First Nation is located 150 km...Black Lake First Nation is located 180 km...and Fond du Lac First Nation is located 230 km away from the Project as recognised on page 4-47 of the draft EIS. Our community members generally access the Project area via overland routes rather than the established Provincial Road network.</p> | Thank you for the information. |

Denison's Responses to Comments from YNLR on the Wheeler River Project draft EIS
November 23, 2023

| Ref. No. | Source | Reference to EIS, appendix, or supporting documentation | Comment Summary (all original submissions can be found on Canadian Impact Assessment Registry reference: 80171) | Denison Response |
|----------|----------------------|---|--|---|
| 424 | YNLR (March 4, 2023) | Section 1.0 Project Introduction and Overview, p. 1-4 and 1-7 | <p>Comment #4 and 5, Appendix B: Athabasca Denesųliné land uses include, but are not limited to, large and small game harvesting, gathering activities, and fishing, all of which are of key cultural importance.</p> <p>It is important to note that the Hatchet Lake Denesųliné First Nation and the community of Wollaston Post are situated at Wollaston Lake and given their downstream location there is potential for negative impacts.</p> | <p>Potential effects from the Project on surface water quality were comprehensively assessed in Section 8.2 of the draft EIS. The assessment evaluated discharge of treated effluent from the site using predictive modeling. Water treatment will be conducted in the onsite Industrial WasteWater Treatment Plant (IWWTP) and treated effluent will be tested prior to release to Whitefish Lake. Treated effluent that does not meet the effluent discharge criteria in the provincial approval to operate or effluent criteria defined in the Metal and Diamond Mining Effluent Regulations will not be released to Whitefish Lake and will be recirculated to the process water pond for eventual re-treatment in the IWWTP. In the draft EIS, Section 8.2 the predictive modeling showed that constituent concentrations including radionuclides would be below water quality objectives for the protection of aquatic life (i.e., no effects would be expected) at the outlet of Whitefish Lake. The outlet of Whitefish Lake is well upstream of the inflow of Icelfander River to Russell Lake. Since no effects on surface water quality are expected to occur in the lake closest to the Project, no effects would accrue in areas further downstream in the watershed, where contributing sub watersheds are many, many-times the size of the sub watersheds near the Project site. As such, there will be no effects on surface water quality in Wollaston Lake from the Project activities.</p> |
| 425 | YNLR (March 4, 2023) | Section 3.0 Value of IK in EA Practice, p. 3-5 | <p>Comment #7, Appendix B: YNLR notes that while the wording for EIS Page 3-5, first paragraph, is an improvement from the May 2021 draft, it does not make clear that no Wheeler River site specific Athabasca Denesųliné knowledge or land use studies were undertaken and that the information presented is from a variety of other projects with differing objectives and study areas.</p> <p>The issue is better captured/described in the EIS on page 11-39.</p> | Acknowledged, updated language will be included in the EIS. |
| 426 | YNLR (March 4, 2023) | Section 3.0 Value of IK in EA Practice, p. 3-10 | <p>Comment #8, Appendix B: YNLR notes that there appears to be grammatical errors for page 3-10, last paragraph of the EIS.</p> <p>YNLR requests edits to: "Ya'thi Néné Lands and Resources, the point of contact for and representative of the Athabasca Denesųliné communities of Black Lake, Fond du Lac, and Hatchet Lake Denesųliné First Nations, as well as the northern hamlets/settlements of Stony Rapids, Wollaston Lake, Uranium City, and <u>Camsell Portage, provided their report; An Exploration</u></p> | Acknowledged, edit will be made to the EIS. |

Denison's Responses to Comments from YNLR on the Wheeler River Project draft EIS
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| | | | <u>of Recorded Athabasca Denesųliné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of Denison Mines Wheeler River Project</u> , that summarized traditional knowledge and land use and occupancy information collected for various other projects and initiatives and partially documented Athabasca Denesųliné use in the Project area, although it is not considered as a site-specific study." | |
| 427 | YNLR (March 4, 2023) | Section 3.0 Value of IK in EA Practice, various pages | <p>Comment #9, 10, 12, 15, 16, 17, 19 and 35, Appendix B: YNLR notes that as the Athabasca Denesųliné were not considered to be an Indigenous COI, the opportunities to contribute to our knowledge to this discussion were diminished or lost.</p> <p>Comment #19, Appendix B: The mis-categorization as the Athabasca Denesųline am Indigenous Community rather than as an Indigenous COI is a step backwards rather than forwards with regards to reconciliation. A letter to Denison dated July 29, 2022, YNLR critiqued the designations of COI and IC as being artificial and marginalizing. Denison responded October 28, 2022, after the submission of Wheeler River EIS with an alternative view.</p> <p>Other related comments include:</p> <ul style="list-style-type: none"> • Comment #9, Appendix B: Only 4 of 31 aspects influenced (from EIS Table 3.5-1) for Indigenous knowledge and 3 of 37 aspects influenced (from EIS Table 3.5-2) for local knowledge were taken from Athabasca Denesųline knowledge sources. How will Denison address this? • Comment #10, Appendix B: YNLR notes that the Athabasca Denesųliné communities should be considered an Indigenous COI per Denison's definition (EIS page 4-vii) as they are/have: <ul style="list-style-type: none"> ○ signatories of Treaty 10 and Athabasca Denesųline traditional territory is within the Project area (Hatchet Lake First Nation is a signatory to Treaty 10 as recognised on page 4-47 of the draft EIS) | <p>Denison's approach to identifying Indigenous COIs considered several factors as identified in Section 4.3.1 of the EIS. Being signatories of Treaty 10 was among, but not the sole applicable criteria, and not all Treaty 10 communities are considered as Indigenous COIs for the Project. Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca Denesųliné communities' relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesųliné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesųliné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the updated EIS.</p> <p>With respect to Denison's consideration of Indigenous Knowledge shared by the Athabasca Denesųliné knowledge sources, Denison notes that Tables 3.5-1 will be updated to better reflect where the YNLR's An Exploration of Recorded Athabasca Denesųliné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of the Denison Mines Wheeler River Project, which was included as an Appendix to the EIS, was considered and included as Table 3.5-1 does not reflect all instances the report was utilized. With respect to Table 3.5-2, only a limited number of data sources were considered and labelled as Local Knowledge - which is representative of information collected outside of a community-led IK process, key person interviews, or engagement events. As such, there may be limited examples in which knowledge shared constituted local knowledge, and may have been considered as either IK or engagement outcomes.</p> |

Denison's Responses to Comments from YNLR on the Wheeler River Project draft EIS
November 23, 2023

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|----------|--------|---|--|------------------|
| | | | <ul style="list-style-type: none"> o established Treaty rights in proximity to the Project o more likely to experience impacts, for example, water drainage as indicated on page 1-7 of the EIS ultimately flows into Wollaston Lake where the Athabasca Denesųline community of Hatchet Lake is located • Comment #12 and 16, Appendix B: YNLR notes that the Project is located within Nuhenéné (the Athabasca Denesųliné traditional territory) as recognised on page 4-61 of the draft EIS. Further, Hatchet Lake First Nation is a signatory to Treaty 10, while Black Lake First Nation and Fond du Lac First Nation are signatories to Treaty 8, and as such all have Treaty Rights within the Project area and that ; that our communities are in proximity to the Project and have demonstrated traditional activity; • Comment #15, Appendix B: YNLR notes that the Athabasca Denesųline has relationships with other projects such as McArthur River and Key Lake as indicated in ROC-78, page 504, Combined Appendices for the Wheeler River Project Draft EIS. • Comment #17, Appendix B: Given these EIS defined criteria, YNLR has difficulty understanding why the Athabasca Denesųliné have been excluded from Indigenous COI status for this project. Exclusion of COI status means loss of opportunity for the communities to be part of greater engagement throughout all stages of the Project. Lost opportunities are considerable and include loss of participation at all phases of the Project and include influence regarding the boundaries of the study areas, possibilities for increased discussions regarding environmental and health concerns, mitigation procedures, and planned remediation, potential to participate in monitoring and research projects and future opportunities such as employment. • Comment # 35, Appendix B: YNLR notes that the engagement database demonstrates that their opportunities to contribute were limited. For example, of the approximately 101 pages of Engagement Database | |

Denison's Responses to Comments from YNLR on the Wheeler River Project draft EIS
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|----------|----------------------|---|--|---|
| | | | <p>tables that are dispersed through several sections of the appendices for the EIS (2022), there are 6 entries credited to the Athabasca Denesųliné. Given an average of 3 to 5 entries per page in the tables, this means that only 1-2% of the contributions were made by the Athabasca Denesųliné. These limited opportunities may well be the result of the exclusion of Athabasca Denesųline from the COI category.</p> <p>[Additional questions on this topic directed to regulators or government entities are included in the CNSC table]</p> | |
| 428 | YNLR (March 4, 2023) | Section 4.0 Engagement, p. 4-14, 4-61 | Comment #20 and 22, Appendix B: YNLR note that project is within Nuhenéné. There is no need to state the southern edge. It could be argued that the Project is on the northern edge of other Indigenous groups areas. Such descriptions have been applied inconsistently to the groups. Territories should be described in an unbiased manner. | Noted, EIS will be updated accordingly. |
| 429 | YNLR (March 4, 2023) | Section 4.0 Engagement, p. 4-61 | Comment #23, Appendix B: YNLR notes that the EIS text on page 4-61 should recognise that this report was a compilation of existing YNLR data from a variety of projects with differing objectives and study areas, and that no research was commissioned. | Noted, EIS will be updated accordingly. |
| 430 | YNLR (March 4, 2023) | Section 4.0 Engagement, p. 4-65 | <p>Comment #24, Appendix B: YNLR believes that the EIS section on page 4-65 referring to the letter sent by Denison dated October 28, 2022 rather than in early October as stated in the draft EIS. Given the draft EIS was submitted to the CNSC on October 24, 2022, four days before Denison responded to YNLR concerns, further opportunity to provide clarifications or specific details for inclusion in the EIS were lost.</p> <p>YNLR does not agree that all our concerns have been addressed in the EIS.</p> | Denison understands the EIS involves an iterative process and Denison will continue to engage with YNLR at their direction. |
| 431 | YNLR (March 4, 2023) | Section 11.0 Land and Resource Use, p. 11-8 | Comment #26, Appendix B: YNLR notes that the Athabasca Denesųliné had limited opportunity to contribute to VCs. One community virtual meeting was presented to the Athabasca Denesųline, while there appears to have been approximately 12 events for other First Nation communities (combined) including | In March 2019, Denison was notified by the YNLR that the Indigenous communities within the local Athabasca communities identified were interested in the Project and that YNLR held the Duty to Consult from these communities. Since receiving correspondence from the YNLR office in 2019 Denison has been collaboratively working with the YNLR office in a mutually |

Denison's Responses to Comments from YNLR on the Wheeler River Project draft EIS
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| | | | workshops, school presentations, meetings (in person and virtual) and open houses (draft EIS pp 4-16 to 4-86). While YNLR appreciate the opportunity to participate and recognize the impacts of Covid-19, the difference between Athabasca Denesųline participation and other groups is stark. | agreed upon manner and will continue to do so. Denison understands the EIS involves an iterative process and Denison will continue to engage with YNLR at their direction. |
| 432 | YNLR (March 4, 2023) | Section 11.0 Land and Resource Use, p. 11-14 | Comment #27, Appendix B: YNLR notes that the Athabasca Denesųliné have demonstrated land use in both the local and regional land use as per our report (YNLR 2022). YNLR has reported 371 Athabasca Denesųline Traditional Land Use and Occupancy data entries within the Denison regional study area. These include 18 points for harvesting of big game, such as barrenground caribou, moose, and woodland caribou, 29 overnight sites, 21 points where birds or eggs such as duck and spruce grouse were harvested. Other activities include furbearer harvesting, fishing, including commercial and tourism related activities such as guiding. A map of these activities is reiterated here. | Thank you, noted. |
| 433 | YNLR (March 4, 2023) | Section 11.0 Land and Resource Use, p. 11-18, 11-40, 11-41, 11-94 and 11-95 | Comment #28, 31 and 32, and 34 Appendix B: YNLR notes that Denison's understanding of the nature of the 2022 YNLR Report is incomplete. As YNLR noted many times, this report is an amalgamation of known information contained within YNLR's database. It comes from a variety of projects each with differing objectives and geographic scope. It is not a Wheeler River-specific Athabasca Denesųliné Knowledge, Land Use, and Occupancy (ADKLUO) Study. This, in our opinion, leads to misunderstandings and misrepresentations within the draft EIS. Additional clarifications are that our report is not a Wheeler River-specific TLU study, nor were any such specific works undertaken or commissioned. This is important because it sets the tone for comparisons with other Indigenous groups who have met with Denison far more frequently and conducted far more intensive and focused works. Additionally, the limited engagement with did not allow for a shared Athabasca Denesųline – Denison in- depth exploration of Athabasca Denesųliné experiences. | Section 11.1.2.4 of the EIS will be updated to reflect the fact that the YNLR's report is an amalgamation of known information from YNLR's database and was not collected explicitly for the purposes of the Project, and as such, should be interpreted by the reader with caution. Section 3.3 of the YNLR's report notes that the comments shared are not geo-located. Without having the locations disclosed, information may have been excluded from Section 11.0 as there was no way to confirm whether those activities overlapped with the spatial boundaries under consideration for potential effects to Indigenous Land and Resources Use. |

Denison's Responses to Comments from YNLR on the Wheeler River Project draft EIS
November 23, 2023

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| | | | <p>Using the YNLR Report requires an understanding that the amalgamated information comes from a variety of projects and was collected for a variety of purposes. For example, the report mentions woodland caribou values, tracks, and sightings within the EIS study area.</p> <p>This information comes from various caribou studies and our database records project.</p> <p>information. This information clearly demonstrates that Athabasca Denesųline members were in the EIS area, that harvesting or other values were not recorded is a function of the purpose of the woodland caribou study rather than an indication that Athabasca Denesųline do not utilize the area for other traditional purposes. Other such interpretations or misrepresentations exist within the report. Additional engagement with the Athabasca Denesųliné communities and YNLR could have ensured further clarification.</p> <p>Information from the 2022 YNLR Report Section 3.3 appears to have been disregarded in the draft EIS. This information includes references to activities mentioned during duty-to-consult works for other projects with the LSA. This includes hunting, fishing (including commercial) and the gathering of berries and medicines. The responses also indicate that the land is used for therapeutic purposes, youth gatherings, fish camps and general camping. Further the responses note that areas were utilized year-round for hunting, trapping, and fishing, with activities such as berry picking occurring in summer. Impact concerns raised by the interviewees in included damage to the lands and water, how wildlife will be affected, disruption to traditional activities and accessibility to the areas while projects are ongoing. Surely, this information is relevant to the Wheeler River project and should be included with the EIS?</p> <p>YNLR also indicated to Denison in July 2022 that some of the publicly available information is the draft EIS was misleading and of limited relevance to this project.</p> | |

Denison's Responses to Comments from YNLR on the Wheeler River Project draft EIS
November 23, 2023

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|----------|----------------------|---|---|--|
| 434 | YNLR (March 4, 2023) | Section 11.0 Land and Resource Use, p. 11-37 | Comment #29, Appendix B: YNLR notes that the Map of BQ Caribou Range in draft EIS Section 11.1.3.3.26 is misdated, it should be BQCMB 2012. The original source map is dated 2000, but includes telemetry data from 2012 so is more appropriately dated as 2012. | Noted, the map included in Section 11.1.3.2.6 (Figure 11.1-5) will be updated to reflect the appropriate date. |
| 435 | YNLR (March 4, 2023) | Section 11.0 Land and Resource Use, p. 11-40 | Comment #30, Appendix B: YNLR notes, as they did previously, that they are unclear what the relevance of including these sources is, since neither the CBEMP nor the Tazi Twé project investigated land use in the Wheeler River area. The March 2022 YNLR compilation report provides clear indications that the Athabasca Denesųline communities utilize the areas in the vicinity of the Project. | Noted, Denison provided publicly available information on the Community Based Environmental Monitoring Program and the socio-economic baseline assessment for the Tazi Twé Hydroelectric Project EIS to provide context on recorded harvests in locations close to communities and distant from the Project. Section 11.1.3 further provides context from the YNLR 2022 report and their recorded land use in the vicinity of the Project. |
| 436 | YNLR (March 4, 2023) | Section 11.0 Land and Resource Use, p. 11-40 | Comment #31, Appendix B: YNLR notes that the citations on the EIS page 11-40 are listed as YNLR 2020 and should likely be 2022. | Noted, the EIS will be updated. |
| 437 | YNLR (March 4, 2023) | Section 11.0 Land and Resource Use | Comment # 33, Appendix B: Pages 11-94 and 11-95 of the EIS uses the term historic. YNLR notes that the use of the term historic is prejudicial and incorrect. YNLR were assured by Denison that they had removed the term historic during earlier discussions. | Denison has verified that the term 'historic' is not included or referenced on pages 11-94 or 11-95 of the EIS. |
| 438 | YNLR (March 4, 2023) | Section 11.0 Land and Resource Use | Comment #36, Appendix B, EIS Page 11-100 third- and fourth-lines states "The YNLR described trapping activity by one of its Athabasca Denesųliné member at Keefe Lake to the east of the RSA but did not report any trapping in N-14 (YNLR 2022)." YNLR notes that the reference to trapping in N-14 is perplexing as the Saskatchewan Trappers Association map shows that N-14 is south of the Project area. Further there is a typo: "not" instead of "nor" | Denison will revise the EIS to correct the typo. |

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From: [Janna Switzer](#)
To: [Bruce Hanbidge](#)
Cc: [Carolanne Inglis-McQuay](#); [Garrett Schmidt](#)
Subject: Re: [**]YNLR individual comments on Denison's responses.
Date: Friday, April 5, 2024 3:55:32 PM
Attachments: [image001.png](#)
[Outlook-k54cniwf](#)

Good afternoon Bruce:

On February 2, 2024 YNLR provided Denison with a comment letter on *Denison's Response to YNLR's Comments on the draft EIS* (November 23, 2023). A meeting was held on February 22, 2024 to discuss the outstanding concerns from YNLR. Following this meeting, on March 13, 2024, YNLR provided Denison with the below email and attached additional comments. Below is a response to the March 13, 2024 email and attached document. Comments from YNLR have been compiled into common themes for ease of response.

- 1) No further comment from YNLR – we note that Ref. #'s 375 to 378, 382, 385, 392, 395, and 398 to 438) have no further comment from YNLR related to these. We assume that our responses to these comments are deemed complete by YNLR and will proceed on that basis unless otherwise advised.
- 2) Collaboration on Monitoring Plans and Programs (Ref. #'s 379, 380, 381, 383, 384, 386, 387, 388, 389, 390, 393, 394, 396, 397): As an outcome of our meeting on February 22, 2024, where Denison and YNLR discussed YNLR's desire to be involved in monitoring plan development, Denison provided a follow up email and document from the draft Wheeler River Environmental Impact Statement(EIS) called Summary of Monitoring. The document outlines the conceptual monitoring program for all and stages of the project and how they tie to each Valued Component assessed in the EIS. Denison further committed, in that email, to work with the YNLR in a manner that has been requested of us, which includes sharing further information about monitoring plans as they are developed through the permitting and licencing process. Also in the February 22 meeting, it was noted by YNLR's consultants that the areas of immediate interest were surface and groundwater, aquatics, wildlife and Woodland Caribou monitoring. Denison acknowledged the request made in the meeting and further acknowledges the request in the March 13th email, where all monitoring plans have been requested by YNLR. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans, procedures and work instructions that will be developed, it would be helpful for YNLR to identify which areas monitoring are of interest from which we can then together establish a process and discuss further details about next steps.
- 3) Confidence in the freeze-wall technology (Ref. # 381): This comment received from YNLR

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

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

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

may not be relevant to groundwater monitoring results, but it may have relevance to the considerations in the planning for such monitoring, as an example.

Kindly,
Janna

Janna Switzer

Vice President, Environment Sustainability & Regulatory

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

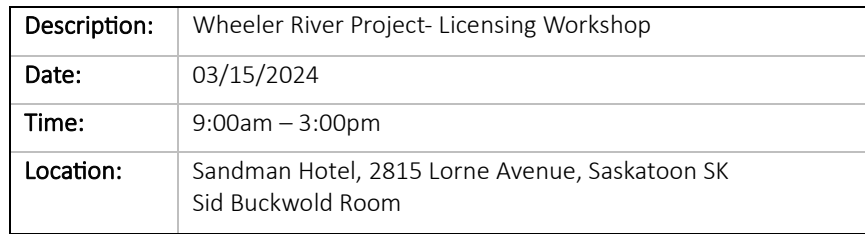
345 4th Avenue South

Saskatoon, SK, Canada, S7K 1N3



TSX: DML | NYSE MKT: DNN

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| Attendees |
|--|
| English River First Nation <ul style="list-style-type: none"> – Angie Campbell – Archie Campbell – Ashley LaPlante – Bernadette Eaglechild – Carol Wolverine – Cheyenna Hunt – Edward Black – Frankie Campbell – Fred Campbell – Irene Apesis – Isidore Campbell – Jason W. – Katrina Maurice – Lawrence McIntyre – Lisa Rossette – Marie Black – Maurice Gunn – Norman Wolverine – Olivia Maurice – Ovid Wolverine – Patrick D’Jonaire – Randy McIntyre – Robin Kusch (Environmental Advisor) |
| Denison Mines Corp <ul style="list-style-type: none"> – Carolanne Inglis-McQuay, CSR Director – Janna Switzer, Environment, Sustainability, Regulatory VP – Ryan Nagel, Licensing Lead – Sarah Benson, Environment Manager – Stephanie Lukowski, CSR Coordinator |

English River First Nation

Licensing Workshop Report

Summary: Key Topics and Potential Next Steps

Key Topic: Climate Change

- Tipping Points
- Permafrost Thaw
- Natural Disasters
- Emergency Response

Potential Next Steps: Licensing Discussion

- Environmental Management Program
- Facility and Equipment Management Program
- Emergency Preparedness and Response Program

Potential Next Steps: Other

- Permafrost Characterization
- EA Findings Overview on Climate Change
- EA Findings Overview on Environmental Impacts on the Project

Key Topic: Aquatic Environment

- Water Quality
- Whitefish Migration

Next Steps: Licensing Discussion

- Effluent and Emissions Monitoring Plan
- Environmental Monitoring Plan
- Biodiversity Management Plan
- Environmental Code of Practice

Next Steps: Other

- General Discussion on Effluent Release Point and Area of Whitefish Migration.
- General Discussion on Perspective of Plans in Relation to Whitefish Migration.

Key Topic: Terrestrial Environment

- Moose Calving Area

Next Steps: Licensing Discussion

- Environmental Monitoring Plan
- Environmental Code of Practice
- Biodiversity Management Plan

Next Steps: Other

- General Discussion on the Moose Calving Area
- Approach to Monitoring Moose (What Metrics are Monitored, How are They Monitored)
- General Discussion on Perspective of Plans in Relation to Moose Calving Area.

Key Topic: Access to Information

- Publicly Availability
- Baseline Study

Next Steps: Licensing Discussion

- Public and Indigenous Information Program

Next Steps: Other

- Avenues in Which Information can be Accessed.
- Summary of Baseline Study Findings

Key Topic: Education

- School Programs

Next Steps: Other

- Discuss Perspectives on School Programs that Related to Mining Industry
- Discuss Person Responsible for Theoretical Design and Implementation of School Program

Key Topic: ERFN Specific Processes

- Guardian Program
- Strategic Plan

Next Steps: Other

- Discuss Purpose and Interval of Strategic Plan
- Discuss Guardian Program (Purpose, Vision, Relationship to Any Key Topics Above)

Kineepik Métis Local Land User Meeting Notes



| | |
|---------------------|--|
| Description: | Wheeler River Project- Licensing Workshop |
| Date: | 05/08/2024 |
| Time: | 5:00pm – 7:00pm |
| Location: | Community Hall, the Northern Village of Pinehouse Lake |

| Agenda | |
|--------|--------------------------|
| 5:00pm | Meal |
| | Opening Remarks |
| | Opening Prayer |
| | Introductions |
| | Presentation & Questions |
| | Conclusion |
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| Attendees |
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| Kineepik Métis Local Chelsea Iron Mallory Lariviere Damien Georges Vince Natomagan |
| Denison Mines Corp Carolanne Inglis-McQuay, Director of Corporate Social Responsibility Brianne England, Regulatory Manager Sarah Benson, Environmental Manager Ryan Nagel, Licensing Lead Stephanie Lukowski, CSR Coordinator |

Discussion Notes

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| KML | How many lbs/year of uranium do you estimate during operation for the Wheeler River Project. |
| Carolanne Inglis-McQuay | It is estimated at 9,000,000 lbs/year of U3O8 in the environmental impact statement for the Wheeler River Project. |
| KML | Who monitors right on the site so that employees follow the rules, and do you do inspections? Say if someone changed the oil and who would ensure its safely monitored right on the site. Will there be incident reporting? |
| Sarah Benson | Yes. Incident Reporting System will be in place. Province and CNSC will inspect the site regularly. |
| KML | Do you backfill into the ground after they take the uranium |
| Carolanne Inglis-McQuay | Backfilling where we extract from the ore body is not required due to the structure of the ore body and the ground water. |
| KML | How do you ensure there is no movement of solution below the monitoring wells and below the ore body? |
| Carolanne Inglis-McQuay | There is an impermeable basement rock underneath the ore body that the acidic mining solution can not penetrate. |
| KML | Will the freeze wall go all the way down to the basement rock below the ore body? |

Kineepik Métis Local Land User Meeting Notes



Discussion Notes

Carolanne Inglis-McQuay Yes, the freeze wall will enclose the ore body.

KML There will always be human error. How do we confirm that liquids won't go into the ground water?

Carolanne Inglis-McQuay Freezing technology is already applied at mines in Northern SK. A groundwater monitoring program will be in place.

KML Is the ISR mining method for uranium used elsewhere in Saskatchewan?

Carolanne Inglis-McQuay This method isn't used for uranium in Saskatchewan at present. A similar process called solution mining is common in the potash industry in Saskatchewan.

Sarah Benson The ISR mining method has been used in other countries for mining uranium.

KML In the countries that use the ISR mining method for uranium, have they monitored animals after effluent release. What are the impacts to wildlife that are seen through monitoring in other countries? We will still be eating the berries and moose and fish, it would be nice to know the monitoring results from other ISR mines prior to operation.

Carolanne Inglis-McQuay I understand.

Sarah Benson We did monitoring before we started work, and we will monitor throughout the Project and after the Project is complete. We provide money to the Province to ensure that funds are set aside to continue monitoring.

KML Why is your discharge point at the mouth of the river? Water mixes there. Where two lakes meet is the worst place to put a discharge line. Trapping for muskrat and beavers is right in that area. Land users use that area.

Sarah Benson The EIS shows that there will be no impact within 5m of the discharge location.

Carolanne Inglis-McQuay The precise point location of effluent discharge has not been finalized. Details programs are still in development. If this is an area of concern to KML we can work with Damien and KML to discuss this process. KML did a comprehensive study on land use points that we designed the Project around. If this point wasn't identified at the time these studies were undertaken, it can still be identified.

KML Global warming is a reality. Water is changing and warming. What are your plans for changes to the environment like rising water levels and water temperatures. It is important to have a plan in place and not be reactive.

Carolanne Inglis-McQuay Programs and plans are in development. We will have an emergency response program.

KML Is discharged effluent safe to drink? Our animals will be drinking it.

Kineepik Métis Local Land User Meeting Notes



Discussion Notes

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| Sarah Benson | No it is not safe to drink. To be clear, it is not safe to drink effluent coming directly from the discharge line. But 5m outside of that discharge location, there will be no impact. We hold water in holding ponds and test before release to make sure it meets parameters. If it doesn't meet parameters, we hold it and continue treating it until its acceptable to release. |
| KML | Will you be using a lot of water during operation? |
| Carolanne Inglis-McQuay | I can't recall the exact number assessed in the EIS. A majority of water will come from underground. The amount of water used will be significantly lower than Key Lake and McArthur. |
| Brianne England | We must have appropriate approvals before we take any water. |
| KML | Once you extract the uranium, is it liquid? How is it transported? What are the risks with this? |
| Carolanne Inglis-McQuay | When the uranium comes up the recovery wells it will be liquid and will travel in double walled pipes to the processing plant, about 100m to 200m away. Processing is done on site and we recycle all the mining solution that we are able to. The final product of uranium is solid and will be packed in to drums like they do at Key Lake for transportation. The risks are spills and leaks, which we will be monitoring for and have plans to respond to if they occur. |
| KML | What KM is the Project? |
| Carolanne Inglis-McQuay | KM237 on highway 914 approximately 3 hours away, in between McArthur and Key Lake. |
| KML | Questions about employment. |