



**CMD 25-H9.15**

Date: 2025-10-24

**Written Submission from the  
Ya'thi Néné Lands and Resources  
Office**

**Mémoire du  
Bureau des terres et des ressources  
de Ya'thi Néné**

In the matter of

À l'égard de

**Denison Mines Corporation**

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

**Denison Mines Corporation**

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

**Commission Public Hearing**

**Audience publique de la Commission**

December 2025

Décembre 2025

# YA'THI NÉNÉ LANDS AND RESOURCES INTERVENTION

*In the matter of the Denison Mines Wheeler River Project: Request to develop an in situ recovery  
uranium mining and processing operation*



24 October 2025

## Introduction

The Wheeler River Project, located in the eastern portion of the Athabasca Basin in northern Saskatchewan, is being developed by Denison Mines Corporation. According to the CNSC, the Project would involve a uranium mining and processing operation with a production capacity of approximately 9 million pounds of triuranium octoxide annually for up to 15 years.

Before the Commission can make a licensing decision under the Nuclear Safety and Control Act (NSCA), the environmental assessment (EA) for the Project must first be considered under the federal regulatory regime.

The CNSC has scheduled a two-part Public Hearing to consider both the EA and the license application for the Project: the first part occurred on 8 October 2025, and the second part will be held during the week of 8-12 December 2025.

Ya'thi Néné Lands and Resources (YNLR) holds a Participant Funding Contribution Agreement with the CNSC to provide an intervention related to Denison's application for a license to prepare the site and construct the Wheeler River mine and processing operation (hereafter, the "Application").

The purpose of YNLR's intervention is to provide the perspective, concerns and rights-holder context of the Athabasca Denesūliné and Basin Residents, whose traditional territories will be directly and indirectly affected by the Project.

For the purposes of this intervention, YNLR has referenced its prior submissions, including its intervenor and rights-holder statements for legacy uranium-mining projects in the region, and where relevant will draw parallels and contrast lessons learned.

## Background of YNLR and Nuhenéné

The Athabasca Denesūliné First Nations of Black Lake, Fond du Lac and Hatchet Lake established YNLR to support the management of consultation and engagement with the First Nations throughout their traditional territory of Nuhenéné. YNLR also supports consultation and engagement activities with municipal communities in the Athabasca Basin (Stony Rapids, Wollaston Lake Post, Uranium City, and Camsell Portage). The Athabasca Leadership have mandated YNLR to protect Nuhenéné and promote the interests of its residents.

YNLR is a federally incorporated non-profit organization that is 100% owned by the Athabasca First Nations and Communities. Strategic direction and decision making is provided through elected Leadership and governance structures. YNLR operates five offices in Saskatchewan (Saskatoon, Fond du Lac, Black Lake, Hatchet Lake, and Uranium City) and staff utilize traditional and scientific knowledge to support informed decisions related to land protection and promoting interests of all Basin residents.

YNLR works to protect the lands and waters of Nuhenéné for the long-term benefits of its member Denesúliné First Nations and Athabasca communities, guided by their knowledge, traditions, and ambitions, while being a respected partner in relations with industries, governments, and organizations who seek to operate in Nuhenéné. Engagement with the Athabasca Communities is necessary to secure social license for activities affecting their rights and interests.

The First Nation members of YNLR are all signatories to treaties with the Crown.<sup>1</sup> A significant majority of the residents of the municipalities represented by YNLR are also Aboriginal persons,<sup>2</sup> with Aboriginal and/or Treaty rights protected by section 35 of the *Constitution Act, 1982*.

References in this intervention to “the Aboriginal and Treaty rights of YNLR members”, refers to the Aboriginal and/or Treaty rights, as the case may be, held by the First Nations, and/or exercised by the Aboriginal persons resident in the municipalities, as the case may be.

### Background of YNLR and Denison Mines

YNLR has maintained an active working relationship with Denison Mines in relation to the Wheeler River Project. Since the project’s early stages, YNLR has been closely involved in reviewing Denison’s Project Description and Environmental Impact Statement to ensure that potential impacts to Nuhenéné are fully understood and addressed.

In October 2022, YNLR and the Athabasca Basin communities signed an Exploration Agreement with Denison that supports exploration activities at defined property locations, including Wheeler River. This agreement formalized a framework for collaboration and information sharing, reinforcing mutual commitments to environmental protection, community engagement, and economic participation.

YNLR and Denison continue to meet regularly to discuss YNLR’s concerns and work collaboratively toward resolving outstanding issues in a manner that respects the rights, values, and priorities of Athabasca residents.

### Document Timeline and Submission

YNLR was notified of this Application on 3 February 2025 and applied for funding to intervene in the Application soon thereafter. YNLR received the fully executed funding agreement on 20 June 2025. Commission Member Documents (CMD) submitted by CNSC Staff and Denison were made available on 9 August 2025.

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<sup>1</sup> Fond du Lac and Black Lake Denesúliné First Nations are both signatories to Treaty 8. Hatchet Lake Denesúliné First Nation is a signatory to Treaty 10.

<sup>2</sup> According to the 2016 census, 89.5% of Wollaston Lake residents, 78% of Stony Rapids residents, and 60% of Uranium City residents are Aboriginal. Data for Camsell Portage is not available.

Once YNLR received the CMDs, YNLR undertook the following tasks:

- Participated in joint in-person and virtual meetings with the YNLR Board of Directors, Athabasca Land Protection Committee (ALPC), and CNSC staff on 18 September 2025.
- Conducted a technical review.
- Conducted a legal review.

YNLR is providing this submission on behalf of its member communities. This intervention is intended to provide the Commission with a summary of key issues relevant to the Application. YNLR and its advisors have engaged in as much analysis as possible within the time frame available.

### YNLR Concerns and Recommendations

YNLR is pleased to provide the following feedback to the CNSC public hearing regarding the licensing of Denison Mines' Wheeler River uranium mine and processing project within Nuhenéné. YNLR is dedicated to the environmental and socio-economic sustainability of our ancestral homeland. To this end, we support sustainable development that lives up to these tenets.

The CNSC has very recently concluded:

*Taking into account the implementation of the proposed mitigation measures, follow-up monitoring program measures and commitments made by Denison to Indigenous Nations and communities, CNSC staff recommend that the Commission conclude that the Project is not likely to cause significant adverse environmental effects.<sup>3</sup>*

While YNLR accepts this conclusion, it does so with some caution. Human beings are not infallible and errors in design, modeling, construction, and operation of the mine will likely occur. As a result, YNLR cannot understate the need for a carefully designed and implemented monitoring program for all aspects and phases of the mine. To this end, the CNSC also states:

*Should the Commission determine that the Project is not likely to cause significant adverse environmental effects, Denison will be required to further design and implement an EA Follow-Up Monitoring Program to verify the accuracy of the EA predictions for the Project, determine the effectiveness of measures taken to mitigate potential adverse environmental effects and support the implementation of adaptive management measures to address unanticipated adverse environmental effects. The Follow-Up Monitoring Program will form part of the licensing basis, should the Commission issue a licence to prepare site and construct the Project, and will be part of the planned regulatory oversight along with environmental monitoring programs required by the licence.<sup>4</sup>*

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<sup>3</sup> CNSC 2025 Environmental Assessment Report: Wheeler River Project

<sup>4</sup> CNSC 2025 Environmental Assessment Report: Wheeler River Project

The Athabasca region continues to live with the long-term impacts of legacy uranium operations such as the Beaverlodge Mine near Uranium City. Despite decommissioning efforts, contamination, tailings management issues, and landscape degradation remain significant concerns for nearby communities and land users. Earlier this year, YNLR and the seven Athabasca Basin leaders opposed the transfer of ownership of the Beaverlodge site from Cameco to the Government of Saskatchewan's Institutional Control Program (ICP), emphasizing that cumulative effects and environmental liabilities had not been adequately addressed. The decision to approve that handover despite these concerns demonstrates the importance of ensuring that new proposed mines, such as Wheeler River, are developed and managed with stronger accountability and transparent, Indigenous-led monitoring from the beginning. The generational impacts of Beaverlodge must not be repeated. Effective closure planning, financial assurance, and long-term stewardship are critical from day one of project approval.

Therefore, YNLR fully supports this requirement with the added emphasis that Indigenous people are fully involved with this and other required monitoring efforts, including the ability to timely review all summarized field data collected.

YNLR's initial concerns regarding the Wheeler River mine centered on the issues of:

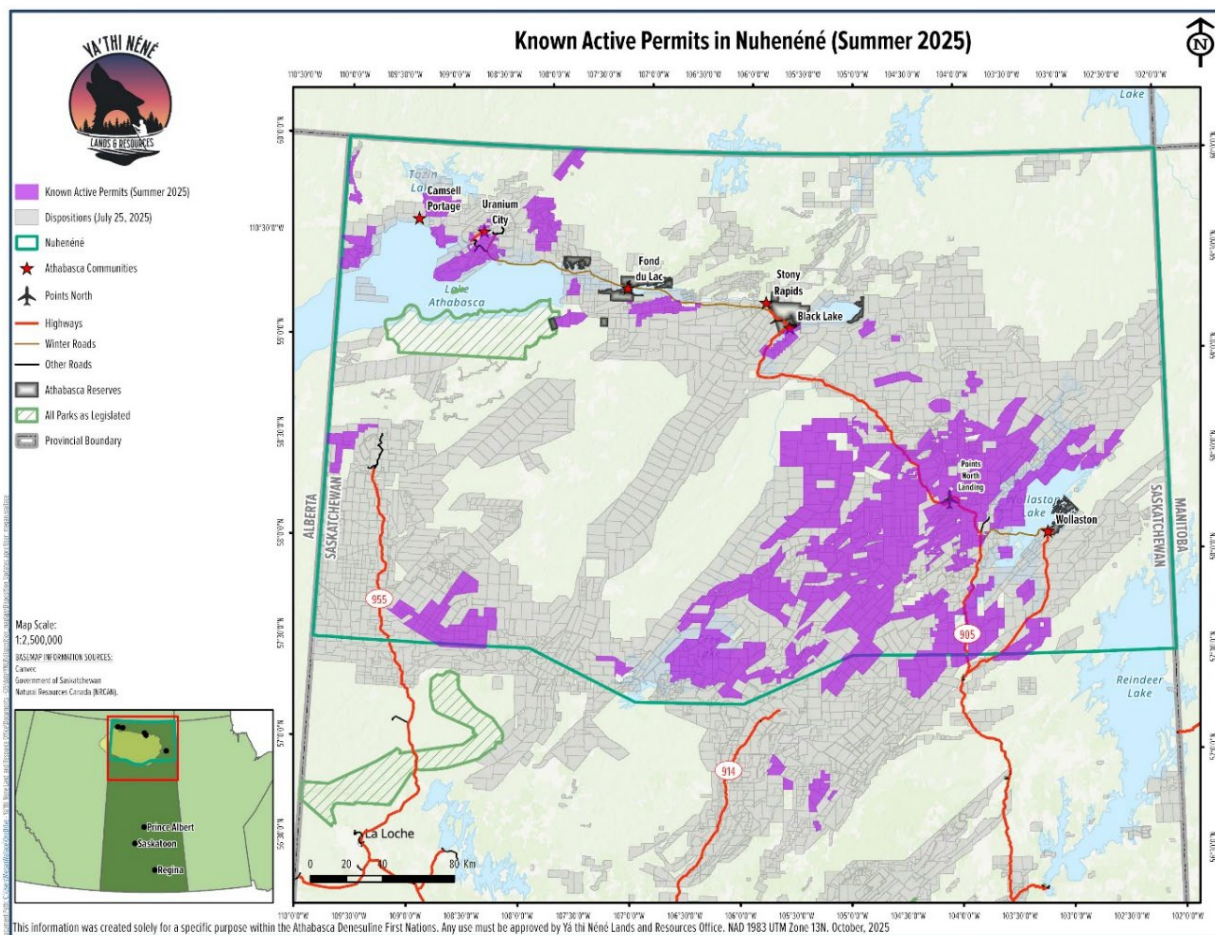
- The nature of Indigenous consultation
- Cumulative effects, especially for woodland caribou
- Water quality and fish health
- Environmental monitoring

Numerous meetings between YNLR, Denison, and the CNSC have contributed significantly to a greater understanding of these concerns for all parties, and we look forward to further working with Denison and the CNSC should the Project be approved.

The Province of Saskatchewan has already provided a Ministerial Decision for the Wheeler River project dated 31 July 2025, which directed Denison Mines to provide a plan that evaluates effects on woodland caribou together with an offsetting habitat proposal. The Ministerial Decision Item further identified the need for a traffic impact and maintenance assessment. YNLR would like to review all monitoring plans together with follow up requirements in addition to the above-mentioned plans at the earliest opportunity, considering that Denison has a submission requirement for these plans prior to initiating construction.

We retain our concern regarding cumulative effects. As noted by the CNSC, the total extent of human disturbance was not sufficiently factored into the assessment analysis. Our own estimate shows that the total amount of known linear disturbance within Nuhenéné is more than 20,400 km and growing.

Furthermore, looking into the future, the total number of current mineral claims and exploration activity is also increasing rapidly (see Figure 1).



**FIGURE 1: MAP SHOWING EXTENT OF MINERAL DISPOSITIONS AND ACTIVE PERMITS WITHIN NUHENÉNÉ AS OF SUMMER 2025**

As explained in the 2021 *Yahey v British Columbia* court case, there is a recognized inverse relationship between cumulative effects and practice of Treaty rights. The test for treaty infringement is not whether there is no ability left to exercise the rights at all, but whether a First Nation's rights have been significantly diminished.

YNLR is not suggesting here that the Wheeler River mine is significantly diminishing Treaty rights. However, given the unknown true extent of existing human disturbance and the rapid expansion of interest in mineral exploration and development in Nuhenéné, YNLR will remain cautious and watchful on this matter.

### Closing Remarks

The Wheeler River area has a long history of traditional land use and is culturally important to Athabasca Denesūliné and Athabasca community residents. YNLR appreciates our ongoing communications with the CNSC regarding this and other Applications pertaining to Wheeler River. This document summarizes our concerns outlined in the Commission Member Documents authored by the CNSC and Denison Mines pertaining to the development of the Wheeler River mine and processing operation.

Once again, thank you for considering this submission. YNLR looks forward to working with both the CNSC and Denison Mines in the future.