



February 26, 2026

Ms. Janna Switzer
Vice President, Environment, Sustainability and Regulatory
Denison Mines
Saskatoon Office
345 4th Avenue South
Saskatoon, SK S7K 1N3

Dear Ms. Switzer:

In accordance with the summary record of decision by the Commission [1] for the licence UML-MINEMILL-WHEELER.00/2031, authority for the administration of licence condition 14.1 has been delegated to CNSC staff, as described in CNSC staff's Commission Member Document submission [2].

Based on CNSC staff's review of the information shared by Denison Mines Corp. (Denison) related to the regulatory commitments under licence condition 14.1, I hereby accept that the closure criteria have been met for the following regulatory commitments:

- PD-01 (monitoring wells and freeze wall designs)
- PD-02 (wellfield and surface infrastructure designs)
- PD-04 (mill designs)
- EMFP-01 (updated fire protection design criteria)

With the acceptance of the closure criteria, Denison can perform the licensed activities associated with the commitments.

Based on CNSC staff's review of the information shared by Denison related to EA Conditions under licence condition 14.1, I hereby accept that the closure criteria have been met for the first parts of the following EA Conditions that are required prior to the commencement of site preparation activities:

- EA3 (woodland caribou mitigation and offset plan)
- EA4 (bat baseline survey)
- EA5 (monitoring plans for adverse effects on wildlife species)

For a full summary of the EA conditions and regulatory commitments and their status, please see appendix A.

With the acceptance of the closure criteria, Denison may commence site preparation activities under their licence.

Yours sincerely,



Denison Letter of EA
Condition and Regula



CNSC Staff's
Acceptance Letter to

Kim Campbell,
Acting Director General
Directorate of Nuclear Cycle and Facilities Regulation
Canadian Nuclear Safety Commission

cc: K. Himbeault, R. Nagel, B. England, Regulatory (Denison)
A. McAllister, K. Gorzkowski, B. Duhaime (CNSC)

Ref:

- [1] CNSC Letter, *Summary Record of Decision*, February 18, 2026
- [2] *CMD 25-H9 – Submission from CNSC Staff on Licence Application for Site Preparation and Construction of the Wheeler River Mine and Mill*, August 2025

Appendix A:

Appendix A.1: EA Conditions Prescribed by the Commission

Condition Number	EA Condition	Closure Criteria Requirements	Timeline Required By
EA1	The licensee shall conduct further characterization and assessment of geological and hydrogeological conditions and update the groundwater flow and contaminant transport models and the EA follow-up monitoring programs and mitigation measures as necessary.	<p>Submission for review and acceptance by a person authorized by the Commission of an updated geological and hydrogeological assessment to the CNSC that:</p> <ul style="list-style-type: none"> • Uses additional characterization data collected throughout the construction phase and updates the assessment of hydraulic conductivity, effective porosity, dispersivity, and geological structure within the desilicified zone. • Addresses IRs (IRs 89, 89-R1, 53, 78, 96 and 97) carried over from the EA review to licensing. • If the additional characterization data and assessment demonstrates variation from data used in the EIS, update the groundwater flow and contaminant transport models with additional available data. <p>Submission for review and acceptance by a person authorized by the Commission an updated EA Follow-up Monitoring Program and mitigation measures if assessment and modelling results indicate additional monitoring and mitigation measures are required.</p>	<p>Licence to operate application.</p> <p>Open.</p>

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EA2	<ol style="list-style-type: none"> 1) The licensee shall collect additional baseline water and sediment quality data to supplement existing baseline characterization data. 2) The licensee shall update the ERA and near-field water quality modelling with the additional baseline data collected. 3) The licensee shall review the option of calculating site-specific K_d values for use in future licensing phase ERAs. 	<p>To address Part 1 of the condition:</p> <ul style="list-style-type: none"> • Conduct sampling of additional pre-construction baseline water and sediment quality characterization data. • Review and acceptance by a person authorized by the Commission of finalized effluent concentrations derived from the BATEA, ensuring and that these concentrations are within the bounds of the EA, and the environmental risk assessment. • Review and acceptance by a person authorized by the Commission of the methodologies for power analyses and any additional supporting statistical analyses for water and sediment quality data. <p>To address Part 2 of the condition:</p> <ul style="list-style-type: none"> • Review and acceptance by a person authorized by the Commission of an updated ERA that: <ul style="list-style-type: none"> ○ Conducts a sensitivity analysis on regional sediment coefficients utilized in the IMPACT modelling and updates ERA conclusions as needed. ○ Incorporates the results of the power analysis and any additional supporting statistical analyses for the water and sediment quality data. 	<p>Prior to in-water works.</p> <p>Open.</p>
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		<ul style="list-style-type: none">○ Incorporates the additional pre-construction baseline data collected into the IMPACT modelling.○ Conducts a sensitivity analysis on low (7Q10 low flow, monthly low flow, and monthly average flow) and high receiving environment water flows.○ Updates IMPACT modelling using the results of the sensitivity analysis to provide an assessment of impacts to water quality from changes in low and high flows and climate change.○ Completes supplementary validation of model performance against additional collected monitoring data including validation of regional sediment coefficients against measured data where possible.○ Addresses IRs (IR-101, 107, 113, 113-R1, 115, 115-R1, 124, 194, 198, and 199) carried over from the EA review to licensing and adequately addresses CNSC staff technical comments from the previous ERA review.○ Addresses information requests in EA4.● Review and acceptance by a person authorized by the Commission of updated near-field water quality modelling incorporating the additional pre-construction baseline data collected.	
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		<p>To address part 3 of the condition:</p> <ul style="list-style-type: none">• After collecting additional site-specific data and conducting the validation of regional sediment coefficients against measured data, where possible Denison shall calculate site-specific sediment coefficients for future ERA updates.• Review and acceptance by a person authorized by the Commission of the methodology for calculating site-specific sediment coefficients, which may incorporate both site-specific and regional data.	<p>Licence to operate application unless changes to the timeline are accepted by a person authorized by the Commission.</p> <p>Open.</p>
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Condition Number	EA Condition	Closure Criteria Requirements	Timeline Required By
EA3	<p>The licensee shall submit a woodland caribou mitigation and offset plan based on site-specific information to evaluate effects to woodland caribou and includes a plan for habitat offsetting. The plan must ensure that measures are taken to avoid or lessen any adverse effects to woodland caribou and monitor those effects. The plan shall be consistent with the Government of Canada's Amended Recovery Strategy for Woodland Caribou (<i>Rangifer tarandus caribou</i>), Boreal Population, in Canada.</p>	<p>Review and acceptance by a person authorized by the Commission of a draft woodland caribou mitigation and offsetting plan to the CNSC that:</p> <ul style="list-style-type: none"> • Discusses overall consistency with the federal Amended Recovery Strategy for Woodland Caribou. • Describes the residual adverse effects on caribou including details on the loss of critical habitat and biophysical features. • Provides details of the mitigation hierarchy, including avoidance, minimization, on-site restoration, and offsetting measures. • Provides details on monitoring for the effectiveness of proposed mitigation measures. <p>Regarding offsetting, the plan may include the proposed:</p> <ul style="list-style-type: none"> • Offsetting ratio amounts (in hectares) • Methodologies and associated benefits, uncertainties, and risks • Locations including habitat types • Timing • Ownership • Justification of how the offsetting achieves no net loss of critical habitat • Contingency measures 	<p>Prior to the commencement of site preparation activities.</p> <p>Criteria met on February 25.</p>

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Condition Number	EA Condition	Closure Criteria Requirements	Timeline Required By
		<ul style="list-style-type: none"> • Commitment on progress reporting including information to be provided and frequency • Statement on quality assurance and quality control 	
		<p>Review and acceptance by a person authorized by the Commission of a finalized woodland caribou mitigation and offsetting plan to the CNSC that builds on the draft plan and:</p> <ul style="list-style-type: none"> • Provides an offset description, offset ownership, offset assessment, and contingency measures for offsetting. • Progress made on the implementation of offsetting. • Summary of changes made to items proposed in the draft plan. • Adequately addresses CNSC technical comments that were deemed to be appropriate to be deferred to the finalized plan. • Includes a commitment for regular review and update through the life of the project. 	<p>Licence to operate application.</p> <p>Open.</p>

Appendix A:

Condition Number	EA Condition	Closure Criteria Requirements	Timeline Required By
EA4	The licensee shall conduct additional bat baseline surveys to supplement existing baseline characterization data in order to obtain a basic understanding of within-year and between-year variation for bat species, and to inform the environmental risk assessment.	Review and acceptance by a person authorized by the Commission of a report to the CNSC that: <ul style="list-style-type: none"> • Outlines the methodology, timing, and locations for additional bat baseline surveys with appropriate justification. • Provides the results of the additional bat baseline surveys. • Discusses validity of the EA predictions and conclusions based on the new data. • Demonstrates that the baseline data is sufficient to obtain a basic understanding of within-year and between-year variation for bat species. 	Prior to the commencement of site preparation activities. Criteria met on February 25.
		Review and acceptance by a person authorized by the Commission of the next ERA update as per EA2 requirements that incorporates the data from the additional bat baseline surveys and updates the ERA conclusions accordingly.	Submit as part of the next ERA update, related to condition EA2. Open.

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Condition Number	EA Condition	Closure Criteria Requirements	Timeline Required By
EA5	<p>The licensee shall submit plans for the monitoring of adverse effects of the project on listed wildlife species and their critical habitat over the lifecycle of the project.</p>	<p>Review and acceptance by a person authorized by the Commission of detailed plans for the monitoring for adverse effects of the Project on all listed wildlife species identified in the EIS and their critical habitat.</p> <p>The monitoring plan design must:</p> <ul style="list-style-type: none"> • Demonstrate consistency with any applicable recovery strategy or action plan for each species, or other guidance with appropriate justification. • Enable detection of each predicted adverse effects of the project on each species. • Enable verification of the effectiveness of implemented mitigation measures for each adverse effect of the project on each species. • Enable collection of data that allows for a statistically robust comparison to assess potential impacts on listed species over the lifecycle of the project. • Contain at least the following information for each species: objective; target areas/sampling points; monitoring techniques; timing; frequency. • Identify the circumstances under which corrective measures may be needed to address any issue or problem identified through the monitoring. 	<p>Prior to the commencement of site preparation activities.</p> <p>Criteria met on February 25.</p>

Appendix A:

Condition Number	EA Condition	Closure Criteria Requirements	Timeline Required By
		<ul style="list-style-type: none"> • Include a commitment for progress reporting and associated level of information and frequency. <p>Review and acceptance by a person authorized by the Commission of updated detailed monitoring plans to address subsequent project phases for all listed wildlife species and a report to the CNSC that includes:</p> <ul style="list-style-type: none"> • Summary of monitoring results for each listed species. • Discussion of detected adverse effects. • Evaluation of detected versus predicted effects as well as the effectiveness of mitigation measures to address adverse effects. • Any corrective measures taken to address unanticipated or greater than predicted effects. • Review for consistency with any updated applicable recovery strategy or action plans. • Review of list of species for consistency with Schedule 1 of SARA. • Proposed changes to the monitoring plans. 	<p>Prior to the commencement of activities under subsequent licences (e.g., licence to operate, license to decommission).</p> <p>Open.</p>

Appendix A:

Appendix A.2: Licensing Regulatory Commitments

Commitment Number	Description of Requirement	Closure Criteria for the Requirement	Timeline Required By
PD-01	The licensee shall provide the detailed design of the monitoring wells for the freeze wall.	Review and acceptance by a person authorized by the Commission of a detailed freeze wall monitoring well design that provides well locations including geographical coordinates and a map with locations.	Prior to freeze wall construction. Criteria met on February 25.
PD-02	The licensee shall provide the detailed design of the ISR wellfield, including surface infrastructure.	Review and acceptance by a person authorized by the Commission of a detailed ISR wellfield design that: <ul style="list-style-type: none"> • Provides detailed design specifications of surface infrastructure including pumphouses, pipes and controls. • Provides well patterns, distance between wells and well orientations. 	Prior to wellfield construction. Criteria met on February 25.
PD-03	The licensee shall provide: <ol style="list-style-type: none"> 1) The detailed site surface water management plan incorporating an updated Probable Maximum Precipitation (PMP) assessment. 2) The climate change resiliency assessment of the Project. 	Review and acceptance by a person authorized by the Commission of a detailed site surface water management plan that: <ul style="list-style-type: none"> • Provides a PMP assessment that uses a historical storm events database that includes the most recent extreme storm events and meteorological data. • Addresses IR-104 carried over from the EA review to licensing. 	Prior to construction activities for site water management infrastructure. Open.

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Commitment Number	Description of Requirement	Closure Criteria for the Requirement	Timeline Required By
		<ul style="list-style-type: none"> • Incorporates results of the updated PMP assessment and the 100 year 24-hour rainfall event. • Provides the detailed design of site grading, ditches, culverts, and runoff ponds. • Provides a map as well as drawings of the final design and locations of the surface water management infrastructure. <p>Review and acceptance by a person authorized by the Commission of a climate change resilience assessment that provides an assessment of climate vulnerabilities of project infrastructures and operations/activities and the proposed adaptation measures over the Project lifetime.</p>	
PD-04	The licensee shall provide detailed design for the mill as further detailed information is available.	<p>Review and acceptance by a person authorized by the Commission of a detailed design of the mill that incorporates:</p> <ul style="list-style-type: none"> • Human performance considerations • Containment structures • Considerations to the potential impacts to the environment, as needed 	<p>Prior to commencing the mill construction.</p> <p>Criteria met on February 25.</p>
PD-05	The licensee shall provide the detailed requirements for the various cementitious-based materials to be used, with regards to their rheological	Review and acceptance by a person authorized by the Commission of the detailed requirements as outlined in a formal request for information submitted to Denison (email K. Gorzkowski to R.	Prior to construction activities.

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Commitment Number	Description of Requirement	Closure Criteria for the Requirement	Timeline Required By
	properties, durability and resistance to aggressive environments, integration into the overall design, and QA/QC.	Nagel and B. England subject: Design Criteria Comments, sent May 13, 2025).	Open.
EP-01	<p>The licensee shall:</p> <ol style="list-style-type: none"> 1) Provide a detailed diffuser design and assessment to ensure environmental conclusions of risk to aquatic receptors will not change. 2) Incorporate the results of updated near-field modelling in the detailed diffuser design and assessment into the finalized BATEA and ERA updates as needed. 	<p>Review and acceptance by a person authorized by the Commission of a detailed diffuser design and assessment to CNSC staff that:</p> <ul style="list-style-type: none"> • Provides the detailed diffuser design specifications and engineering drawings. • Provides the final location including geographical coordinates and a map of the final discharge location. • Provides updated near-field water quality modelling using detailed diffuser design specifications, finalized effluent concentrations derived from the BATEA, and additional measured pre-construction baseline data. • Incorporate the detailed diffuser design and assessment results into the BATEA and ERA as needed. <p>Addresses IR-110 carried over from the EA review to licensing.</p>	<p>Prior to in-water works.</p> <p>Open.</p>

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Commitment Number	Description of Requirement	Closure Criteria for the Requirement	Timeline Required By
EP-02	The licensee shall provide the finalized Best Available Technology Economically Achievable (BATEA) assessment.	Review and acceptance by a person authorized by the Commission of a final version of the BATEA that: <ul style="list-style-type: none"> • Includes effluent conductivity and TDS values that are technically feasible, and addresses IR-18 carried over to licensing. • Incorporates results and conclusions of the ERA update for in-water works. • Incorporates the results of the finalized diffuser design and updated near-field modelling from EP-01. 	Licence to operate application. Open.
EMFP-01	The licensee shall provide updated fire protection design criteria.	Review and acceptance by a person authorized by the Commission of an update to the criteria with additions that may include: <ul style="list-style-type: none"> • Passive fire protection measures such as automatic sprinklers. • How the proposed structures will mitigate the effects of wildfires. 	Prior to construction activities. Criteria met on February 25.