



Date: September 28, 2024

To: Jonathan Mesher, Water Resource Officer – Nunavut Region
Crown Indigenous Relations and Northern Affairs Canada (CIRNAC)
Jonathan.mesher@canada.ca

From: Merle Keefe
Manager, Environment
B2Gold Back River Corp
mkeefe@b2gold.com

cc: Chris LeGoffe, Environment Superintendent (mkeefe@b2gold.com), Bill Lytle, General Manager and COO (blytle@b2gold.com), Peter Montano, VP of Projects (pmontano@b2gold.com), Ben Scott, Operations Manager (bscott@b2gold.com), Clinton Wakefield, Operations Manager (cwakefield@b2gold.com); John Lythe, Director of Operations MLA (jlythe@b2gold.com)

Subject: **Response to Inspection Reports (2024-KIT-JKM05 -2AM BRP) – Water Licence 2AM-BRP1831 - MLA**

Dear Mr. Mesher,

B2Gold Back River Corp (B2Gold Nunavut; the Company) appreciates the thorough inspection conducted on July 12, 2024, and the detailed report received on September 12th highlighting areas of concern regarding B2Gold Nunavut's Type A Water Licence 2AM-BRP1831. The Company's commitment to environmental compliance is unwavering and we take these concerns seriously.

In response to the report, B2Gold Nunavut has developed a plan addressing each noted concern including a timeline for completion, as per your directive. B2Gold Nunavut aims to ensure our operations align with the conditions outlined in the water licence. Please find B2Gold Nunavut's response plan enclosed with this correspondence.

B2GOLD CORP.

Park Place, Suite 3400 – 666 Burrard Street, Vancouver, British Columbia, Canada V6C 2X8
T +1 604 681 8371 | F +1 604 681 6209 | B2GOLD.COM



CIRNAC Inspection Report Section 2

“The licensee is to provide a plan 2 weeks after receiving the report to ensure the following concerns are addressed, this plan shall include a timeline for implementation”.

1. The licensee is to provide an update on the construction of the lined secondary containment.

B2Gold Nunavut Response:

The Company will complete and submit an Engineering Design Report for the construction of the new Hazardous Waste Management Facility at the MLA by the end of Q4, 2024 (December 31, 2024). This will be completed in conjunction with the lined secondary containment for Goose as well.

Timeline for Completion: December 31, 2024

2. The licensee is to ensure the SEI industries insta berms are installed and maintained as described in the instruction manual, failure follow the instruction manual is a failure to show due diligence in the even of a failure of the insta berms. The licensee to properly install the insta berms and provide photos of the installation of the appropriate substrate layers.

B2Gold Nunavut Response:

Similar to B2Gold Nunavut's response for the Goose Site, SEI Industries 'Insta-Berms' were used as a temporary measure in place until construction of an engineered secondary containment system. B2Gold Nunavut is preparing a secondary containment application for submission to the Nunavut Water Board (NWB) by the end of Q4, 2024. Going forward, the Company will ensure all personnel who handle the 'Insta-Berms' manage them in strict accordance with the manufacturer's specifications, including keeping them clear of any spilled product or accumulated rainwater.

B2Gold Nunavut commits to ensuring this Insta-Berm is placed on suitable material at the MLA (as per the manufacturer's specifications) and managed accordingly. Photographs confirming this remedial activity will be submitted to CIRNAC demonstrating compliance with the above requirements by the end of Q4, 2024.

Timeline for Completion: December 31, 2024

3. The licensee is to provide justification and approval for the removal of the berm around the fill station at the tank farm.

B2Gold Nunavut Response:

B2Gold Nunavut temporarily removed the berm around the fill station at the tank farm until construction was complete. There was no refueling occurring at that former location during this time. The filling station is being upgraded to include a fireball pumping station with a liner installed underneath.

Timeline for Completion: December 31, 2024



4. The licensee is to provide a list of all hazardous waste/ hazardous materials on site and their storage locations.

B2Gold Nunavut Response:

Similar to the directive provided for the Goose site, all bulk fuel volumes and other hazardous substances listed on the E2 Environmental Regulations Schedule 1 'Lists of Substances' are reported via the Environment Climate Change Canada (ECCC) Single Window Information System (SWIM) account. All diesel is stored within bulk tanks situated within engineered secondary containment facilities. Updates will be provided through ECCC SWIM account when necessary for the commissioning of bulk fuel tanks.

B2Gold Nunavut will review the Hazardous Materials Management Plan (HMMP) and submit an updated version for the 2024 NWB Annual Report, and following approval, will provide to the Nunavut Impact Review Board (NIRB). The updated HMMP will include a list of all hazardous waste and hazardous materials on-site as well as their storage locations for both Goose and MLA.

Timeline for Completion: March 31, 2025

Closing

B2Gold Nunavut wishes to assure CIRNAC that our organization is fully committed to achieving and maintaining compliance with the water license conditions. B2Gold Nunavut understands the potential consequences of non-compliance and is taking the necessary measures to address the identified concerns.

B2Gold Nunavut welcomes any further guidance or clarification you may require. The Company is dedicated to continuous improvement and appreciates the opportunity to rectify these issues.

Thank you for your attention to this matter, and we look forward to providing you additional updates as items are addressed to ensure our operations align with regulatory requirements.

If you have any questions or concerns, please contact the undersigned.

Sincerely,

Merle Keefe
Manager, Environment
902.318.5671
mkeefe@b2gold.com

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