



Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
P.O. Box 100  
Iqaluit, NU, X0A 0H0

Your file - Votre référence  
2AM-BRP1831  
Our file - Notre référence  
GCDOCS#121850954

February 9, 2024

Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0B 1J0  
E-mail: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of  
Responses from B2Gold on the 2022 Annual Report for the Back River Project, Type  
A Water Licence No. 2AM-BRP1831**

Dear Richard,

Thank you for the opportunity to review the Licensee's responses to Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) comments on the 2022 Annual Report for the Back River Project for Type A Water Licence No. 2AM-BRP1831.

CIRNAC has reviewed the five (5) responses provided by the Licensee and has identified one (1) outstanding concern, which is described in the attached Technical Memorandum. CIRNAC has no further comments or recommendations on the remaining four (4) responses provided by the Licensee, in the context of the current assessment.

If there are any questions or concerns, please contact me at (867) 975-4550 or [Andrew.Keim@canada.ca](mailto:Andrew.Keim@canada.ca)

Sincerely,

*Andrew Keim*

Andrew Keim  
Regional Manager  
Water Resources, Nunavut Regional Office  
Crown-Indigenous Relations and Northern Affairs Canada



## **Technical Review Memorandum**

**Date:** February 6, 2024

**To:** Richard Dwyer, Manager of Licensing, Nunavut Water Board

**From:** Andrew Keim, Regional Manager, CIRNAC

**Subject:** Crown-Indigenous Relations and Northern Affairs Canada's Review of Responses from B2Gold on the 2022 Annual Report for the Back River Project, Type A Water Licence No. 2AM-BRP1831

**Region:** ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

---

### **SUMMARY**

CIRNAC reviewed the five (5) responses submitted by the Licensee, which were provided to address comments and concerns raised by CIRNAC during its review of the 2022 Annual Report. CIRNAC has identified one (1) outstanding concern, which is related to the potential acceptability of material that was used for construction at the site in 2022 (CIRNAC-#R-04).

CIRNAC previously requested that the Licensee provide clarification on the rock that was used for construction in 2022 and confirm if this material was classified as potentially acid-generating (PAG) rock.

CIRNAC received information from the Licensee that:

- 358,043 m<sup>3</sup> of non-potentially acid-generating (NPAG) rock was generated at the Project in 2022;
- A geochemical characterization was completed, and the results were provided in the Annual Report; and
- PAG rock was not used as construction material in 2022.

At present, it remains unclear to CIRNAC how NPAG rock was selected for construction.

The table referencing geochemical characterization results in the Annual Report (Table 2.6-1) does not specify if all samples correspond to the Echo Pit and underground decline. It is CIRNAC's understanding that the 358,043 m<sup>3</sup> of NPAG rock was sourced from the Echo Pit and underground decline, and all of this rock was used for construction material, as described in Section 2.8 of the Annual Report. However, some of the material in Table 2.6-1 is classified as PAG and PAG – Uncertain.

CIRNAC requests that the Licensee confirm the source location(s) corresponding to the data presented in Table 2.6-1 of the Annual Report and provide supporting evidence that



clearly demonstrates that the rock generated from the Echo Pit and underground decline (or from any other source that was selected) is acceptable for construction (i.e., laboratory analysis confirming the rock used for construction is NPAG).

This information is to be included in the 2023 Annual Report. Failure to comply with approved plans, including the reporting for Annual Reports, will be, and is considered to be, an issue of non-compliance that will be followed up on by the Field Operations Unit and may be subject to further action.