

May 9, 2024

Attention: John Roesch/ Senior Project Officer  
Company Name  
Kitikmeot Inuit Association Dept. of Lands  
PO Box 360, Kugluktuk, NU X0B 0E0

Palmer Project No.: 110602

**RE: Back River Project**  
**Review of B2Gold 2023 Annual Monitoring Report to the Nunavut Water Board – Fish and Fish Habitat**

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## Introduction

Palmer was retained by Kitikmeot Inuit Association (KIA) to provide the Fish and Fish Habitat technical review of the Back River Project 2023 Annual Monitoring Report (the Report) submitted to the Nunavut Water Board (NWB) by B2BGold. The Report provides a summary of the Project activities and compliance monitoring conducted under B2BGold's Water License 2AM-BRP1831.

<b>Review Comment Number</b>	KIA-NWB-01
<b>Subject/Topic</b>	Fish Salvage
<b>References</b>	2023 Annual Report – Section 1 Introduction
<b>Summary</b>	Llama and Umwelt lakes and upstream waterbodies were fished out in preparation for future dewatering.
<b>Detailed Review Comment</b>	The introduction indicates two lakes and other waterbodies were fished out in 2023. No information is provided in the report about whether the fish were salvaged and transferred to another system, or distributed to communities. No information is provided on the methods used or determination of success.
<b>Recommendation/ Request</b>	Provide information on the fish salvage of these systems, including methods, determination of success, and final destination of the fish.
<b>Importance</b>	Medium

<b>Review Comment Number</b>	KIA-NWB-02
<b>Subject/Topic</b>	Water use from Goose Lake
<b>References</b>	2023 Annual Report – Section 2.2, Table 2.2-2
<b>Summary</b>	Water use from Goose Lake is described, but not the maximum amount of water allowed.
<b>Detailed Review Comment</b>	Table 2.2-2 provides details on the amount of water withdrawn from Goose Lake. Above the table, it is indicated that water capacity was calculated by multiplying the lake surface area by 10 cm, but the volume of water calculated is not stated, nor is whether this amount of water is actually permitted by NWB.
<b>Recommendation/Request</b>	Please present the amount of water allowed for use from Goose Lake by NWB and present the officially approved method used to calculate the amount, or cite the document in which these can be found.
<b>Importance</b>	Medium

## Statement of Limitations

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## Closure

If you have any questions regarding the review comments, please do not hesitate to contact me at [glenn.wagner@pecg.ca](mailto:glenn.wagner@pecg.ca) or 236-334-9273.

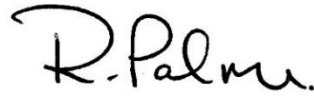
Regards,

**Palmer Environmental Consulting Group Inc.**



**Glenn Wagner, Ph. D., R.P.Bio.**

Senior Fisheries Biologist



**Rick Palmer, M.Sc., R.P.Bio.**

CEO, Palmer

