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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

Licence No: 2AM-BRP1831

November 26, 2024

Merle Keefe
Manager – Environmental Permitting
B2Gold (formerly Sabina Gold & Silver Corp.)
Suite 3400 – 666 Burrard Street
Vancouver, BC, V6C 2X8

Email: mkeefe@b2gold.com

RE: NWB Technical Review of the 2023 Annual Report for Back River Gold Mine Project Licence 2AM-BRP1831.

Mr. Keefe,

The Nunavut Water Board (NWB or Board) has completed the technical review of the 2023 Annual Report (Report), for the Water Licence 2AM-BRP1831 issued for the operation of the Back River Gold Mine Project. The 2023 Annual Report and 2023 Annual Geotechnical Inspection Report were received from B2Gold (Sabina Gold & Silver Corp.) on April 12, 2024.

On February 21, 2024, B2Gold submitted an updated Spill Contingency Plan, Version 4, dated February 2024. The NWB distributed the Annual Report submissions and the updated Spill Contingency Plan to interested parties on April 17, 2024, for a sixty (60) day public review. On May 15, 2024, Environment and Climate Change Canada (ECCC) requested an extension until June 26, 2024.

By June 26, 2024, the NWB received comments from the Kitikmeot Inuit Association (KIA), Crown-Indigenous Relations and Northern Affairs (CIRNA) and Environment and Climate Change Canada (ECCC). B2Gold was requested to provide a response by July 17, 2024. On July 12, 2024, B2Gold requested an extension to submit responses by August 2, 2024. B2Gold submitted their response to comments on August 2, 2024.

By September 3, 2024, ECCC had confirmed that their concerns were addressed by B2Gold's responses. The KIA and CIRNA provided some follow-up requests.

On September 6, 2024, B2Gold submitted the document "Back River Project – Sewage Wastewater Treatment Plant Operation and Maintenance Manual" dated August 2024. This document was mentioned as an attachment to B2Gold's response to comments on August 2, 2024, but was missing from the submission. The NWB invited parties to review this manual and provide comments and information requests by September 23, 2024.

By September 23, 2024, the KIA, CIRNA and ECCC confirmed that they had no comments or concerns at this time.

Copies of all documents, including Interveners' comments, concerns, information requests and responses received during the review can be accessed through the NWB's Public Registry and FTP site using the following link:

<ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-BRP1831%20Sabina/3%20TECH/B%20GENERAL/2%20ANNUAL%20RPT/2023>

The following table provides a brief summary of the issues identified during the Report review that pertain to the NWB's mandate, which require follow up. The table provides comments/deadlines for the Licensee to provide information. For the Interveners' discussion of these items, please refer to the comment submissions referenced above. It should be noted that a number of questions/comments from Interveners were addressed during the review process; therefore, these items are not included within the table.

#	Comment / Recommendation	NWB comment / note / deadline
Kitikmeot Inuit Association (KIA)		
KIA-5	KIA recommends that B2Gold " <i>define the amount of ponded water that requires management for future reference</i> " and clarify how it will be managed. B2Gold is also required to provide rationale for not testing the water quality of the ponded water from overburden stockpile.	B2Gold to provide a response in the 2024 Annual Report.
KIA-13	KIA recommends that B2Gold provide details on the use of hydrogen peroxide, as mentioned in the Spill Contingency Plan.	B2Gold clarified that hydrogen peroxide is no longer used. This information will be corrected in the next revision of the Spill Contingency Plan.
KIA-14, 15, 16, 17, 18, 19	KIA recommends that B2Gold include several updates in their Spill Contingency Plan.	B2Gold to provide the requested information within the 2024 Annual Report.
KIA-21	KIA recommends that B2Gold " <i>avoid broad statements saying that measurements were within range of predictions without reporting on what those results are and what values they are being compared to</i> ".	All future Annual Reports.

KIA-22	KIA recommends that B2Gold ensure the product spilled is identified in the spill log entry.	B2Gold will ensure the product is recorded for each spill log entry in future spill logs.
KIA-23	KIA recommends that B2Gold ensure that GPS coordinates of the location of a spill are recorded within the spill log.	B2Gold will ensure the GPS coordinates are recorded in future spill logs.
KIA	KIA recommends that B2Gold provide information on fish salvage operations for Llama and Umwelt lakes future dewatering. Provide information on the methods, determination of success, and final destination of the fish.	B2Gold to provide a response in the 2024 Annual Report.

Crown-Indigenous Relations and Northern Affairs (CIRNA)		
R-1	CIRNA recommends B2Gold to develop and implement a tundra monitoring plan to document possible changes to the tundra as a result of discharging treated effluent and grey water.	B2Gold will provide an update in the 2024 Annual report.
R-2	CIRNA recommends that B2Gold perform geotechnical inspections of all open pit walls, including assessment of rock wall faces, and report its findings in all future Annual Geotechnical Inspections.	B2Gold informed that A geotechnical inspection of the Echo Pit is planned to be completed in 2024 as part of the AGI and will be included in the 2024 annual report.
R-9	CIRNA recommends that B2Gold ensure that the Lead Author and Inspector for all future Annual Geotechnical Inspections is a professional engineer registered with NAPEG.	All future Annual Geotechnical Inspections.
R-10	CIRNA recommends that B2Gold provide detailed information about the source of Potentially Acid Generating (PAG) waste rock and their volumes used in construction.	B2Gold will provide an update in the 2024 Annual report.

R-12	CIRNA recommends that B2Gold provide a timeline to submit a detailed design report for Hazardous Waste Management Facilities and include a summary of corrective actions taken to address concerns noted in the 2023 CIRNA Inspection Report.	B2Gold stated that they will submit an Engineering Design Report for Hazardous Waste Management Facilities in Q4 2024 and will include a summary of corrective actions in the 2024 Annual Report.
R-15	CIRNA recommends that B2Gold provide detailed plans for incinerator testing in 2024, including the proposed schedule for sampling and analysis, and approximate timeline for all sampling and testing activities planned for the year.	B2Gold will provide an update in the 2024 Annual report.
R-16	CIRNA recommends that B2Gold include a detailed summary and an approximate schedule for the construction and commissioning of the proposed landfill.	B2Gold will provide the requested information in the 2024 Annual report.

Environment and Climate Change Canada (ECCC)		
EC-6	ECCC recommends that the Proponent provide an updated account of all hazardous substances stored at the various Project sites in the Spill Contingency Plan and include detailed information on the location, volume/mass, types of containment, and number of containers for each hazardous substance.	B2Gold will update the relevant plans and provide them within the 2024 Annual report.

After completing the review of the 2023 Annual Report submission for the Back River Project Water Licence 2AM-BRP1831, the NWB has determined that the information provided generally addresses the requirements of current Water Licence. Please ensure the comments provided in the table above are addressed by the deadlines specified.

B2Gold has submitted an updated Spill Contingency Plan (Part B, Item 12) and a Sewage Wastewater Treatment Plant Operation and Maintenance Manual (Part F, Item 7), which were reviewed with the Annual Report submission.

The NWB finds the plans/manuals functional and generally satisfying Water Licence requirements. By copy of this letter, the Board provides its approval through the Board Motion No. **2024-A1-005**, dated **November 21, 2024**, as per Part B, Item 12 and Part F, Item 7 of the Water Licence. The NWB encourages the Licensee to address the intervenors' recommendations in the next revision of the approved Spill Contingency Plan.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (ext. 33) or ali.shaikh@nwb-oen.ca, at your earliest convenience.



Mohammad Ali Shaikh
Nunavut Water Board,
Technical Advisor

Enclosed: Comments – KIA, CIRNA, ECCC

Cc: Distribution List – Back River Project