



Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
918 Nunavut Drive  
Iqaluit, NU, X0A 3H0

Your file - Votre référence  
2AM-BRP1831  
Our file - Notre référence  
GCDOCS# 144808543

April 7, 2026

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 the Landfarm Facility design report for Back River Project, Type A Water Licence No. 2AM-BRP1831**

Dear Richard Dwyer,

Thank you for the 2 March 2026 invitation to review the Landfarm Facility design report, submitted by B2Gold Nunavut for Type A Water Licence No. 2AM-BRP1831.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact William Quere at [william.quere@rcaanc-cirnac.gc.ca](mailto:william.quere@rcaanc-cirnac.gc.ca) or (873) 452-1981 Or Andrew Keim at (867) 975-4550 or [Andrew.keim@rcaanc-cirnac.gc.ca](mailto:Andrew.keim@rcaanc-cirnac.gc.ca).

Sincerely,

William Quere, BSc  
Regional Coordinator

Canada 



## **Technical Review Memorandum**

**Date:** 7 April 2026

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

**From:** William Quere – Regional Coordinator, CIRNAC

**Subject:** **Crown-Indigenous Relations and Northern Affairs Canada’s Review of the Landfarm Facility Design and Construction Application for Back River Project, Type A Water Licence No. 2AM-BRP1831**

**Region:**       Kitikmeot     Kivalliq     Qikiqtani

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### **A. BACKGROUND**

The Back River Project (the Project) is a gold mine operation within the Kitikmeot region of southwestern Nunavut, owned by B2Gold Nunavut (B2Gold). The Project consists of two main areas with an interconnecting winter ice road which are the Marine Laydown Area and the Goose Property. In 2025 the Goose property achieved commercial production and is currently supplied by winter ice roads and airstrips.

The Back River Project currently operates under Type A water licence 2AM-BRP1831. In March of 2026, B2Gold submitted their Landfarm Facility Design Report for review. The landfarm consists four lined cells with three being used for soil remediation and one for ice and snow remediation located at Goose Lake. Each cell will contain a sump and will be sloped in such a way that any runoff, melt, or leachate will collect there. Construction will happen in two phases with pre-construction activities beginning in the winter with an additional eight weeks of construction in the summer of 2026.

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.





## C. RESULTS OF REVIEW

### 1. Erosion and Sediment control measures

#### **Comment:**

For 2.5 part D item 3E, it is stated that

“Effective erosion and sediment control measures will be in place before work begins and maintained”.

CIRNAC is concerned that there is no detail as to what these measures will be or what will be maintained during and after construction.

#### **Recommendation:**

(R-01) CIRNAC recommends that the erosion and sediment controls be detailed and that B2 Gold provide pertinent locations.

### 2. Sumps

#### **Comment:**

In 2.5 Part D item 3E, it is stated that

“The Goose Mine Landfarm / Soil Treatment Facility will be constructed with impermeable HDPE liner and sloped so any water in the cells is collected in a ‘sump’. This water will be managed in accordance with the discharge criteria specified in B2Gold Nunavut’s Type A water License (2AM-BRP1831) – specifically Part F, item 2 & 12”.

CIRNAC is concerned that there is no detail given as to how the collected runoff, snow and ice melt, or leachate will be monitored and managed.

#### **Recommendation:**

(R-02) CIRNAC recommends that B2 Gold provide the plans and tasks required in order to monitor and manage the collected runoff, snow and ice melt, and leachate.



### **3. Access road**

#### **Comment:**

Access roads are mentioned in section 5.2.1 but are not mentioned or defined in any other section. CIRNAC is concerned access roads will be necessary to carry out the construction and operation of the facility.

#### **Recommendation:**

(R-03) CIRNAC recommends that B2Gold clarify whether the access roads will be included in this application or an additional one. Additionally, for either case, CIRNAC recommends the access roads be described and shown in the plan with dimensions.

### **4. Water Control**

#### **Comment:**

In sections 5.2.1 and 5.2.2, ground water control and drainage are mentioned however additional little detail is provided. CIRNAC is concerned that there is currently no specific plan to coordinate water in and around the site during and/or after construction.

#### **Recommendation:**

(R-04) CIRNAC recommends B2Gold provide specific water control plans or methods for the land farm. These plans should include inclement weather conditions and freshet, distance to nearby waterbodies, plans that monitor water and runoff from the site, methods of preventing groundwater from infiltrating the structure, and drainage plans for during and after construction. Control measures should also include location information.