
B2GOLD CORP.

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MEMO

From Chris LeGoffe, Superintendent, Environment, B2Gold Nunavut
Macoura Koné, Manager, Environment, B2Gold Nunavut

To Richard Dwyer, Manager of Licensing, Nunavut Water Board (NWB)

Cc Ali Shaikh, Technical Advisor, Nunavut Water Board (NWB)
Karén Kharatyan, Director of Technical Services, Nunavut Water Board (NWB)

Ref. B2Gold Nunavut 2AM-BRP1831

Date 23 April 2026

Subject Landfarm Notification Memo – Responses to Supplemental Information Request

Dear Mr. Dwyer,

Please find enclosed B2Gold Nunavut's responses to comments and supplemental information request (SIR) received regarding the proposed Landfarm at the Goose Mine. Responses were received from the Kitikmeot Inuit Association (KIA), Fisheries & Oceans Canada (DFO), and Crown Indigenous Relations & Northern Affairs Canada (CIRNAC). Of the three (3) regulatory bodies' responses, only CIRNAC provided comments, recommendations and requested additional information, which has been addressed below. The remaining two (2) regulatory bodies (KIA and DFO) had no comments or concerns regarding the proposed Landfarm.

Sincerely,

A handwritten signature in black ink, appearing to read 'Macoura Koné', written over a horizontal line.

Macoura Koné, Ph.D, P. Geol., P. Geo.
Manager, Environment
B2Gold Nunavut

Cc: Dan Gagnon, General Manager, B2Gold Nunavut
Jamie Richards, Operations Manager, B2Gold Nunavut
Clinton Wakefield, Operations Manager, B2Gold Nunavut

Interested Party:	Crown Indigenous & Northern Affairs Canada (CIRNAC)	TRC NO.:	CIRNAC-R-01
Re:	B2Gold Nunavut – Goose Mine – Landfarm: Erosion and Sediment Control Measures		

CIRNAC’s REVIEW RESULTS

1. Erosion and Sediment control measures

CIRNAC 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.

CIRNAC Recommendation:

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

B2Gold Nunavut Response:

B2Gold Nunavut acknowledges CIRNAC’s recommendation and is providing the following details regarding the Erosion and Sediment Control (ESC) measures for the Landfarm construction:

Erosion and sediment control measures will be concentrated at the downgradient (southern) perimeter of the Landfarm footprint and along the construction access route. Properly keyed-in silt fencing will be installed at the base of all disturbed slopes to intercept runoff. A combination of erosion devices will be used to mitigate sedimentation from the newly constructed pad, and will include:

- **Check Dams/Spring Berms:** Rock check dams or spring berms will be placed within existing drainage swales downgradient of the Facility to reduce flow velocity and settle suspended solids, as required.
- **Surface Stabilization:** If required, straw wattles or erosion control blankets will be applied to exposed embankments to prevent rill erosion during the spring freshet.

The Environment Department will conduct weekly inspections during active construction and daily inspections during peak snowmelt (freshet). The Landfarm Management Plan (Sabina, 2017) will be revised to update these site-specific ESC protocols and will be submitted for approval. While the Facility’s engineered liner system inherently minimizes internal erosion risks, B2Gold Nunavut is committed to these external controls to remain compliant with Part D, Item 3E of Water License 2AM-BRP1831 and to ensure the protection of the surrounding environment.

Interested Party:	Crown Indigenous & Northern Affairs Canada (CIRNAC)	TRC NO.:	CIRNAC-R-02
Re:	B2Gold Nunavut – Goose Mine – Landfarm: Sumps		

CIRNAC’s REVIEW RESULTS

2. Sumps

CIRNAC 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 that 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.

CIRNAC 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.

B2Gold Nunavut Response:

B2Gold Nunavut (B2Gold) acknowledges CIRNAC’s request regarding the monitoring and management of fluids within the Goose Mine Landfarm / Soil Treatment Facility (STF) sumps. B2Gold is committed to ensuring that all contact and contaminated water is managed in a manner that protects the receiving environment and complies with the strict requirements of Type A Water License 2AM-BRP1831. Additional details are provided in B2Gold Nunavut’s Landfarm Management Plan (Sabina, 2017).

To address the concerns raised above, B2Gold is providing below the plans and tasks that will be implemented to manage adequately runoff, snow and ice melt, or leachate:

- **Fluid Accumulation Monitoring:** During the thaw season and following significant precipitation events, the Landfarm cells and sumps will be inspected weekly by the Environment Department staff. These inspections will document fluid levels to ensure adequate freeboard is maintained within the HDPE-lined cells.
- **Water Quality Sampling and Testing:** No water will be discharged from the sumps until it has been sampled and analyzed. Sampling will be conducted in accordance with requirements in the protocols. Specifically:
 - Water samples will be collected and sent to an accredited laboratory for analysis.
 - Collected samples will be tested for parameters defined in Part F, Items 2 & 12 (e.g., Total Petroleum Hydrocarbons, pH, Total Suspended Solids or TSS, and various metals).
- **Runoff, Ice melt and Leachate Management Options:** Based on the analytical results, fluids will be managed via one of three pathways:

1. **Direct Discharge:** If water quality meets the effluent quality criteria (EQC) specified in the Type A Water License 2AM-BRP1831, the water will be discharged to the approved receiving environment.
 2. **Internal Recycling:** If the quality of the water does not meet EQC but is required for operations (e.g., to maintain moisture levels in the soil for optimal bioremediation), it may be reapplied to the Landfarm soil lifts.
 3. **Treatment/Transfer:** If the quality of the water exceeds EQC and cannot be reused, it will be transferred to the Goose Mine Water Treatment Plant or to an alternative approved onsite treatment system for processing prior to discharge.
- **Snow and Ice Management:** During the winter months, snow accumulation within the Landfarm will be monitored. To prevent a surge of meltwater in the spring, clean snow may be removed periodically (provided it has not come into contact with contaminated soil). Any snow that is potentially impacted will remain in the lined Facility to be managed as leachate during the spring freshet.

All monitoring data, including volumes pumped and laboratory analytical results, will be recorded in the Annual Water License Report and submitted to the Nunavut Water Board.

B2Gold Nunavut believes that the existing site-wide Water Management Plan, coupled with these specific STF operational procedures, provides sufficient oversight to mitigate risks associated with leachate and runoff management. Detailed tasks and frequencies will be formally integrated into the next revision of the Landfarm Management Plan.

Interested Party:	Crown Indigenous & Northern Affairs Canada (CIRNAC)	TRC NO.:	CIRNAC-R-03
Re:	B2Gold Nunavut – Goose Mine – Landfarm: Access Road		

CIRNAC’s REVIEW RESULTS

3. Access Road

CIRNAC 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.

CIRNAC 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.

B2Gold Nunavut Response:

B2Gold acknowledges CIRNAC’s recommendation and is providing the following clarifications:

- The Landfarm will be accessed via an existing all-weather site road and a new access road, which will form part of a pad expansion, will be constructed to gain access to the cells. The “pad expansion” is part of a separate submission for a new Waste Management Facility.
- The existing access road is constructed of crushed non-acid generating rock material. The segment adjacent to the Landfarm is shown in the updated drawing (Appendix A).
- While this area will eventually be integrated into a larger, future Waste Management Facility (currently under design for a separate submission to the NWB), the current Landfarm operations will utilize the existing road network.

Please refer to the drawing (Appendix A) which includes the access road dimensions and location relative to the Landfarm footprint.

Interested Party:	Crown Indigenous & Northern Affairs Canada (CIRNAC)	TRC NO.:	CIRNAC-R-04
Re:	B2Gold Nunavut – Goose Mine – Landfarm: Water Control		

CIRNAC's REVIEW RESULTS

4. Water Control

CIRNAC 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.

CIRNAC Recommendation:

(R-04) CIRNAC recommends B2Gold provide specific water control plans or methods for the Landfarm. 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.

B2Gold Nunavut Response:

B2Gold Nunavut (B2Gold) acknowledges CIRNAC's recommendation regarding water control and is providing below control plans or methods that will be used for the proposed Landfarm:

1. Surface Water Management & Drainage (Construction & Operation)

- **Grading:** The Soil Treatment Facility's cells will be engineered and graded to ensure all "contact water" (water that has touched contaminated soil within cells) is directed toward a central lined collection sump (low point) within the Facility footprint and managed accordingly.
- **Diversion Berms:** To prevent "non-contact" run-on from entering the Facility, exterior diversion berms/ditches will be constructed around the perimeter. These will redirect clean surface runoff away from the Landfarm and toward existing natural drainage or site-wide sediment control structures.

2. Infiltration & Groundwater Protection

- **Lining System:** To prevent groundwater infiltration into the structure and leachate migration into the subsurface, the Landfarm will utilize an impermeable HDPE liner placed over a prepared, compacted bedding layer as illustrated in Appendix A of the submitted memo.
- **Separation:** The Facility is designed with a vertical separation between the base of the liner and the seasonal high-water table/permafrost active layer to maintain structural and environmental integrity.

3. Management of Freshet and Inclement Weather

- **Freshet Preparedness:** In alignment with site-wide spring freshet protocols, B2Gold Nunavut will ensure the Landfarm sump is drawn down prior to the spring melt. Snow removal within the Landfarm footprint will be conducted to minimize the volume of meltwater requiring treatment.
- **Freeboard Requirements:** The Facility will always maintain a minimum 1.0-metre freeboard to accommodate extreme precipitation events (e.g., 1-in-100-year 24-hour storm).

4. Monitoring and Discharge

- **Water Quality Testing:** Water collected in the sump will be analyzed. Results will be assessed against Type A Water License discharge limits (specifically for BTEX, F1-F4 hydrocarbons, and TSS).
- **Discharge Protocol:** No water will be discharged from the Landfarm until laboratory results confirm compliance with the requirements and authorization is provided by the Inspector. Water that meets the discharge criteria will then be discharged to the environment via a controlled pumping system (e.g., onto a splash pad to prevent erosion). Water that does not meet the discharge criteria will be directed to the site's Contaminated Water Treatment Plant (CWTP), which will be part of the proposed future Waste Management Facility.

5. Proximity to Waterbodies

- The proposed Landfarm location is situated approximately 440 m upgradient from the nearest waterbody (Goose Lake) and approximately 500 m upgradient from Gander Pond, exceeding the minimum 31-metre buffer requirement set by the Nunavut Water Board (NWB).

6. Location and Drawings

- Specific water control features, including the sump location, diversion ditching, and discharge points, will be implemented during construction to ensure there is no potential of sedimentation from the new footprint. The Landfarm is situated on a bedrock outcrop and is above any surficial water table.

APPENDIX A

FIGURES

PRI ENGINEERING

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**B2GOLD CORP.
GOOSE LAKE LAND FARM
BACK RIVER, NUNAVUT
ISSUED FOR PERMIT
APRIL 22, 2026**

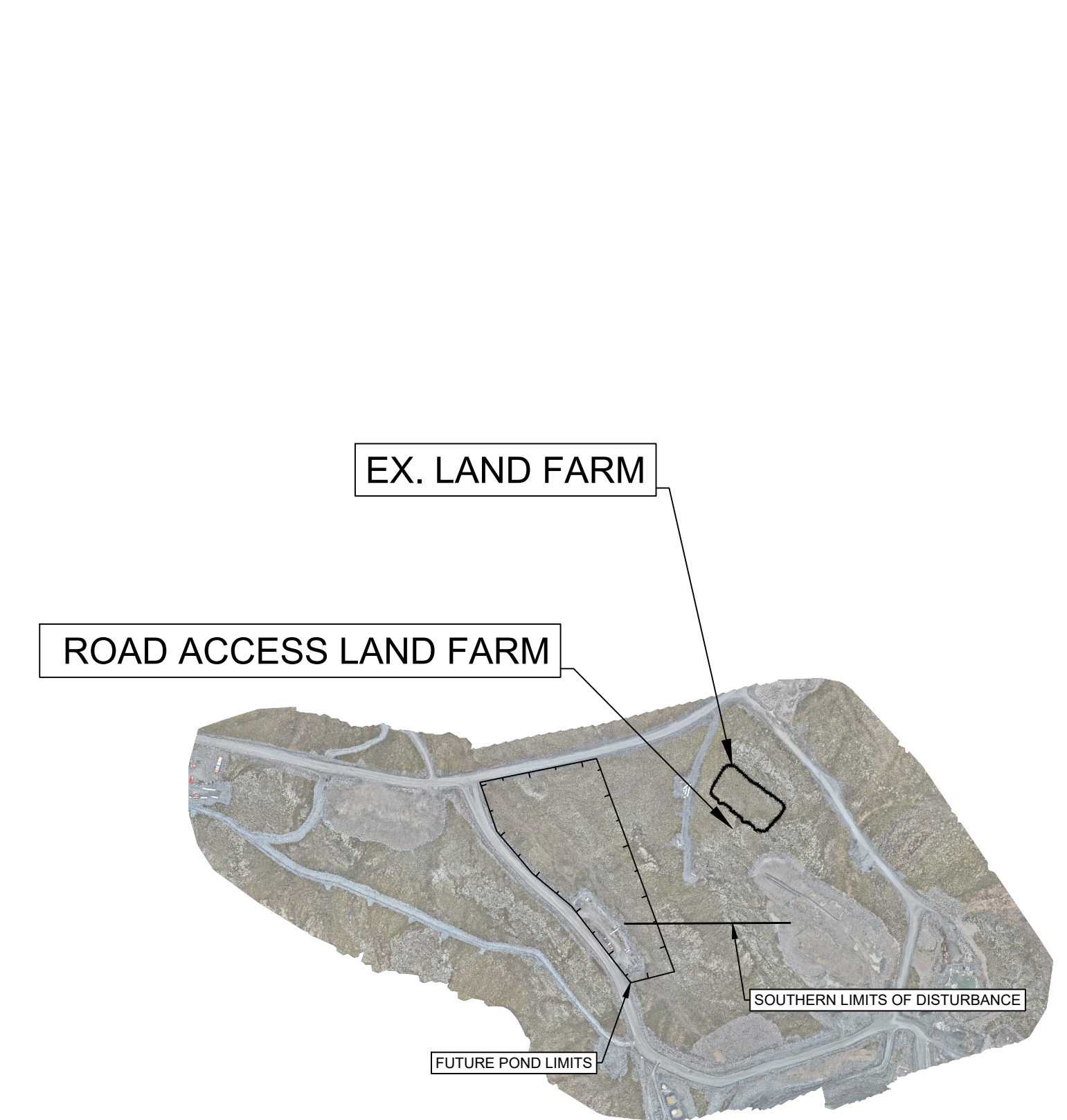


INDEX OF DRAWING SHEETS

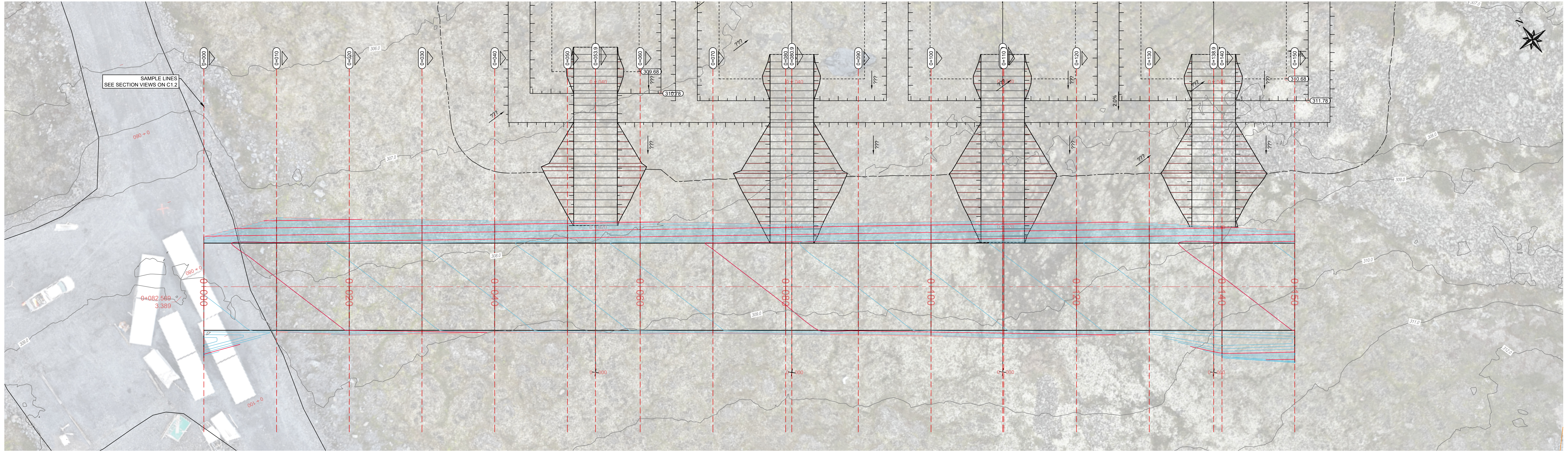
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ACCESS ROAD - PLAN AND PROFILE	2500548-C1.1
ACCESS ROAD - SECTIONS	2500548-C1.2
ACCESS RAMP CELL 1 AND 2 - PLAN AND PROFILE	2500548-C2.1
ACCESS RAMP CELL 3 AND 4 - PLAN AND PROFILE	2500548-C2.2



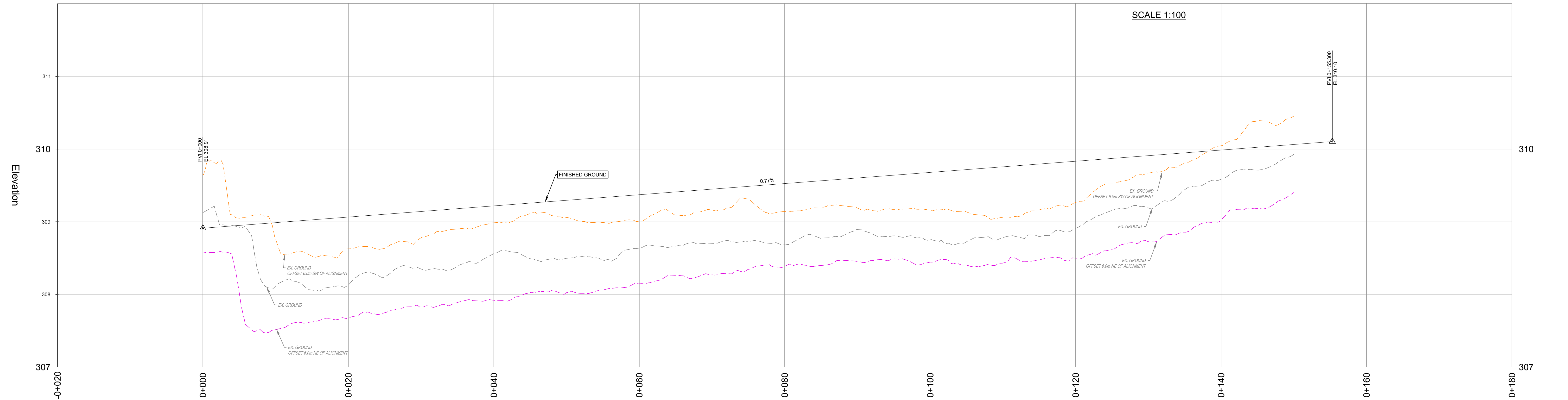
KEY PLAN
CUSTOM



SITE LOCATION PLAN
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SCALE 1:250



SCALE 1:100

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- ALL DIMENSIONS AND ELEVATIONS ARE IN METRES UNLESS OTHERWISE NOTED

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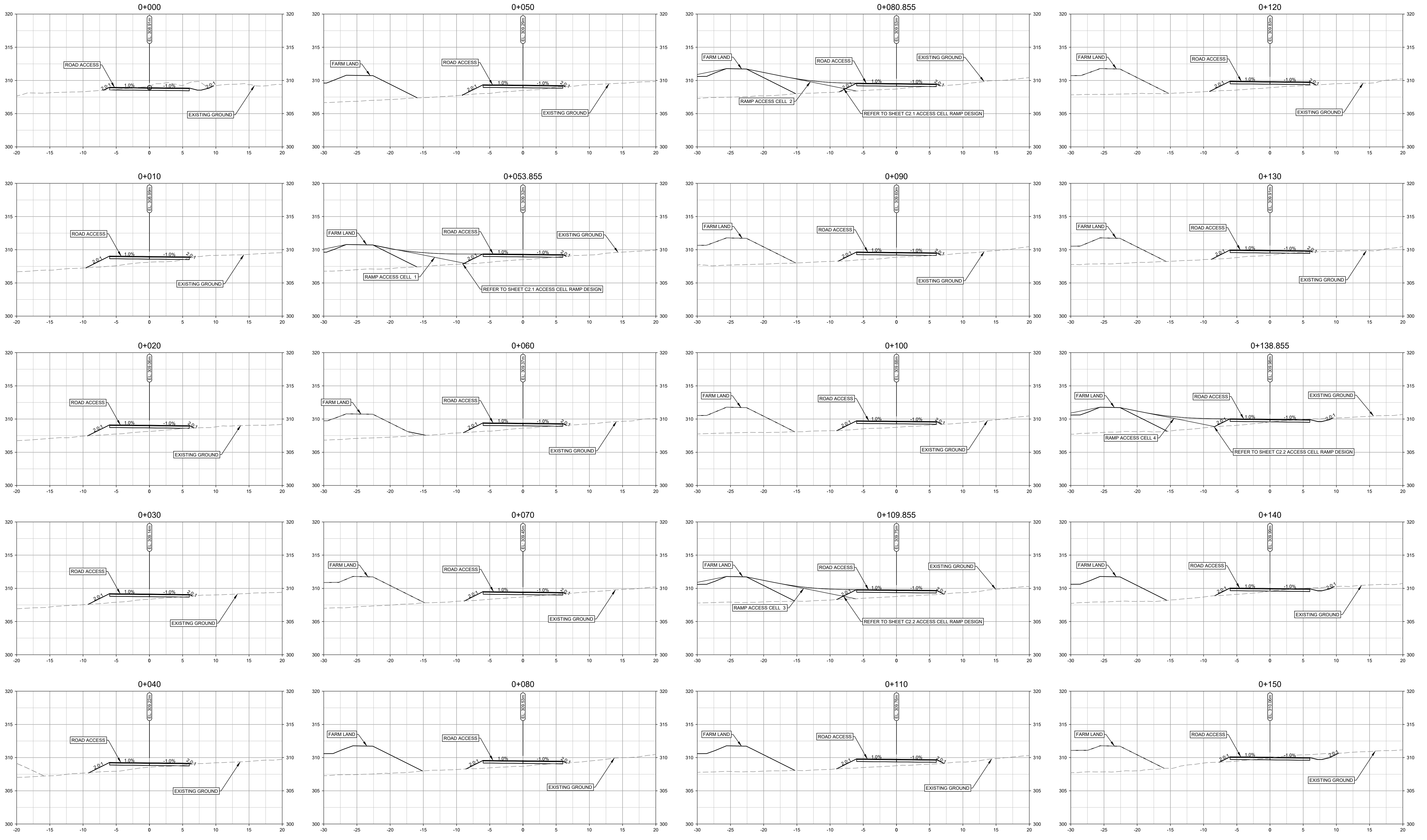
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BACK RIVER, NUNAVUT
GOOSE LAKE LAND FARM
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ACCESS ROAD P&P



Drawing No.
2500548-C1.1

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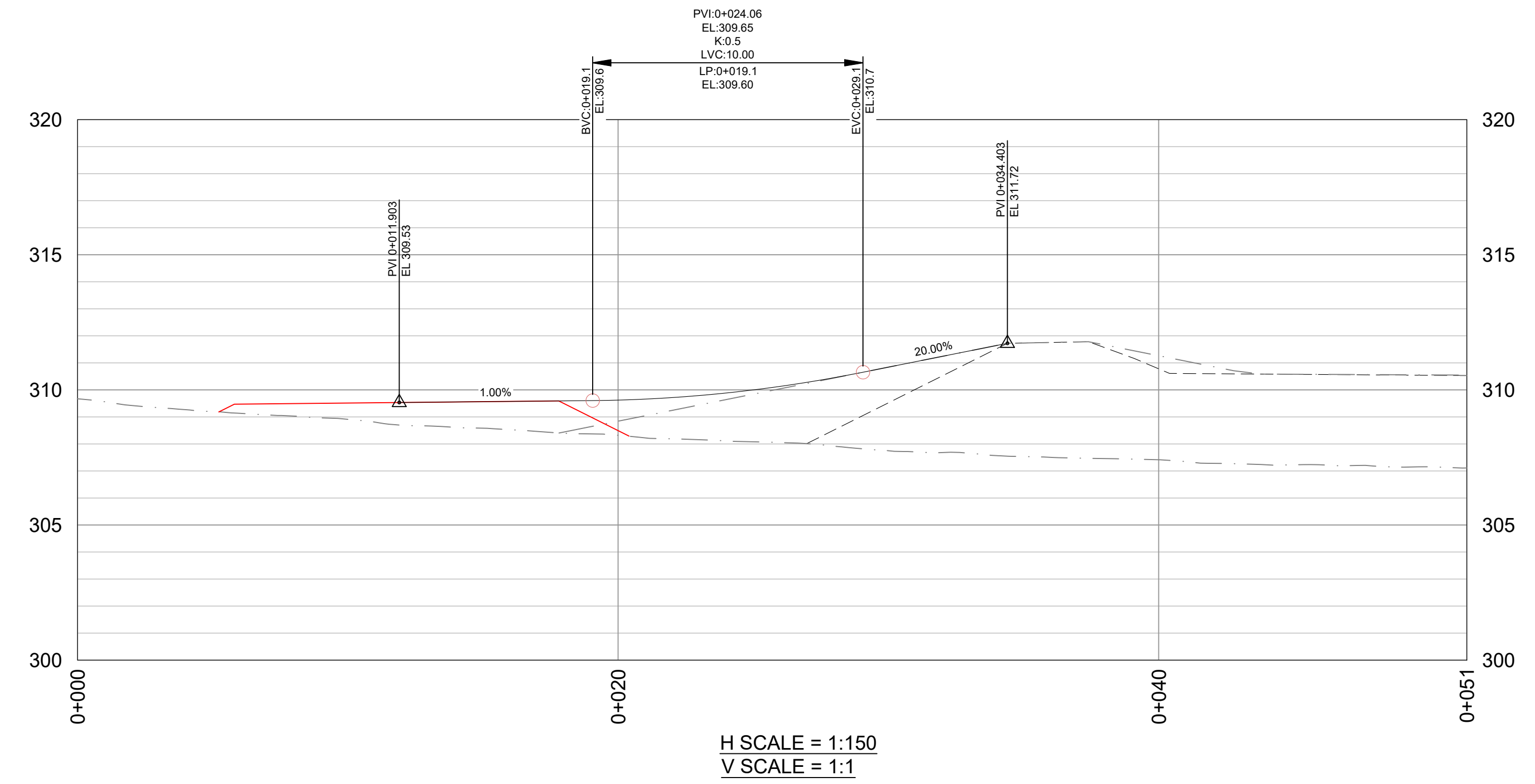
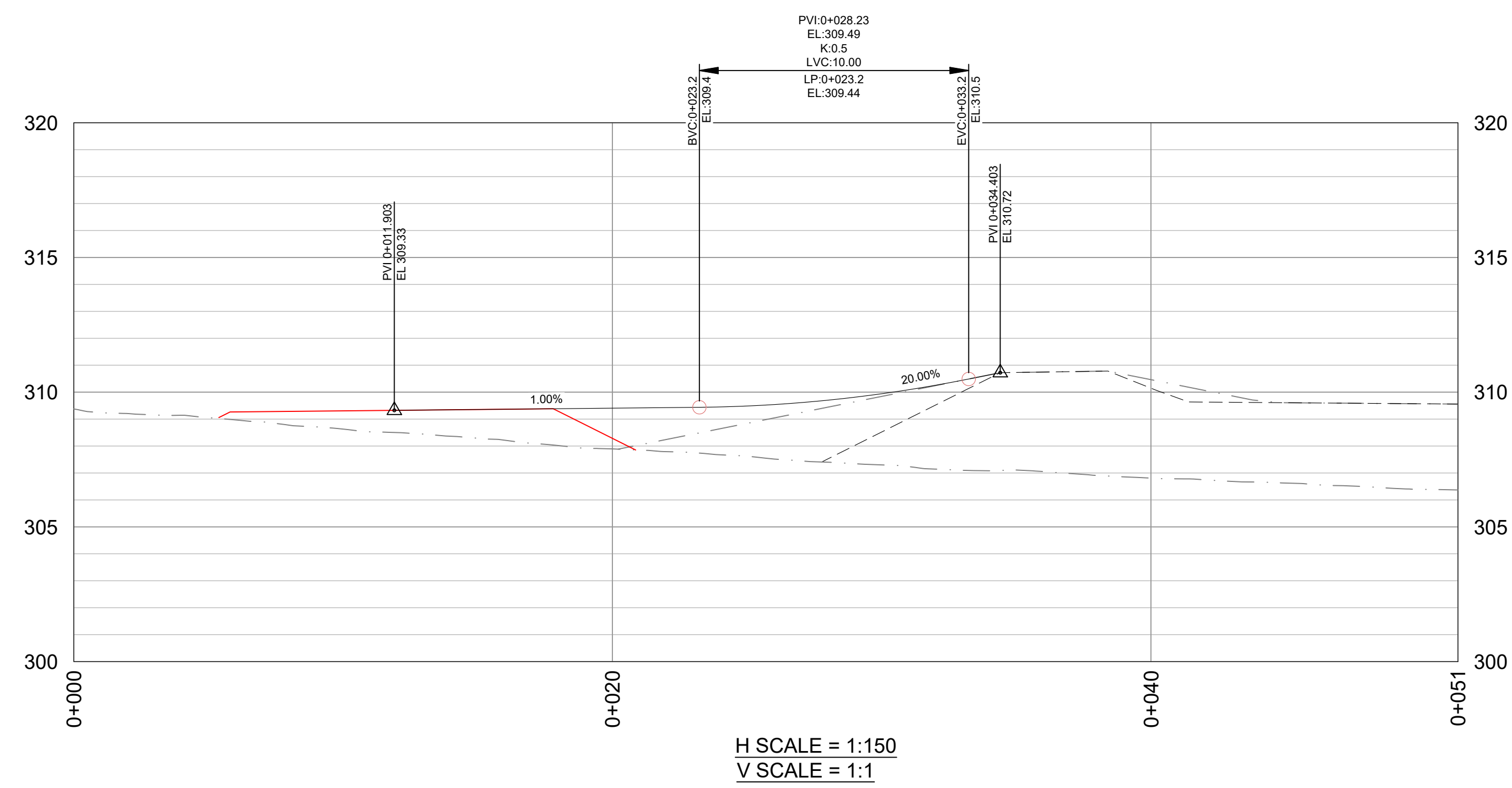
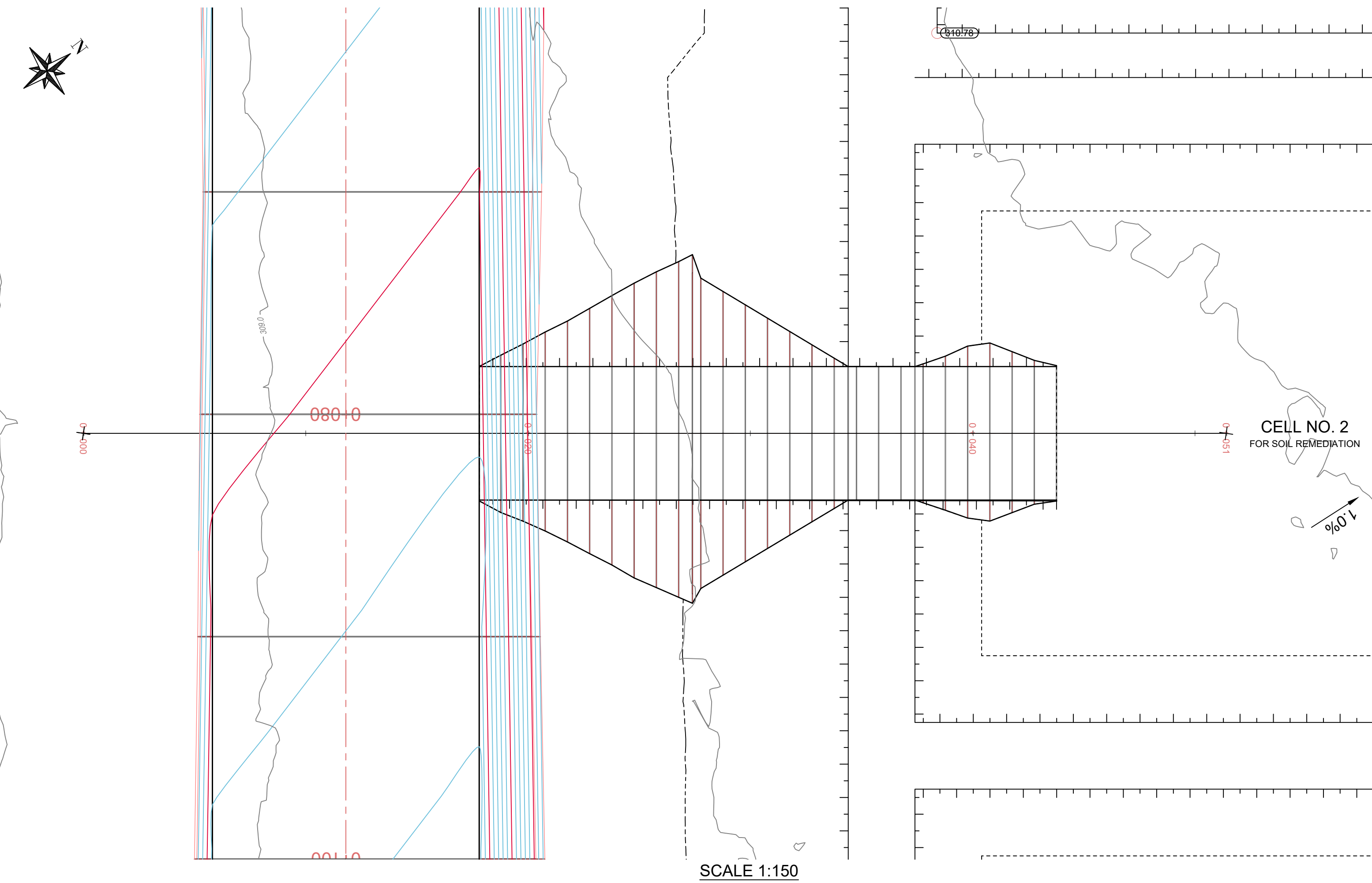
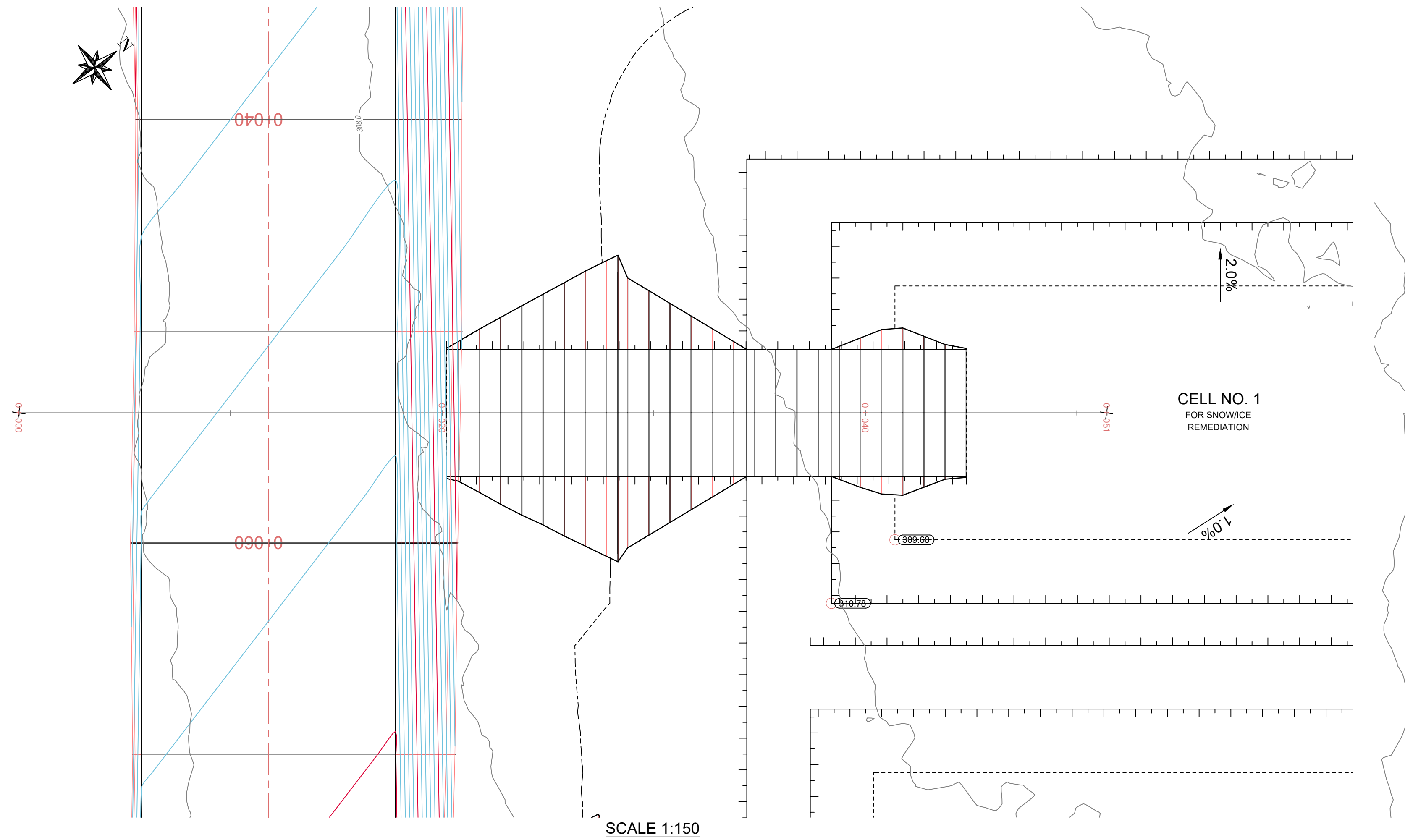
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BACK RIVER, NUNAVUT
 GOOSE LAKE LAND FARM
 B2GOLD CORP.
 ACCESS ROAD SECTIONS

Drawing No.
2500548-C1.2

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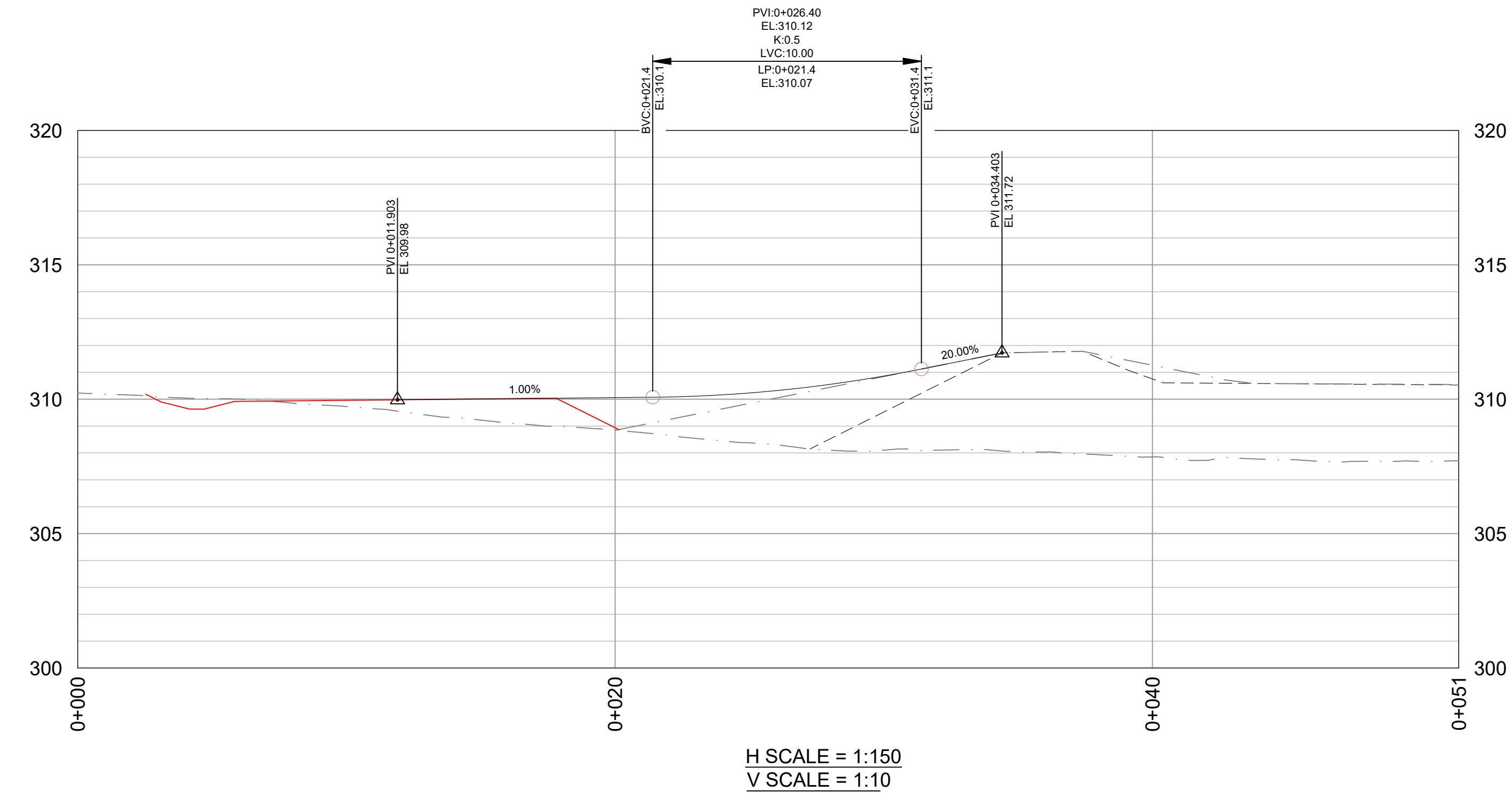
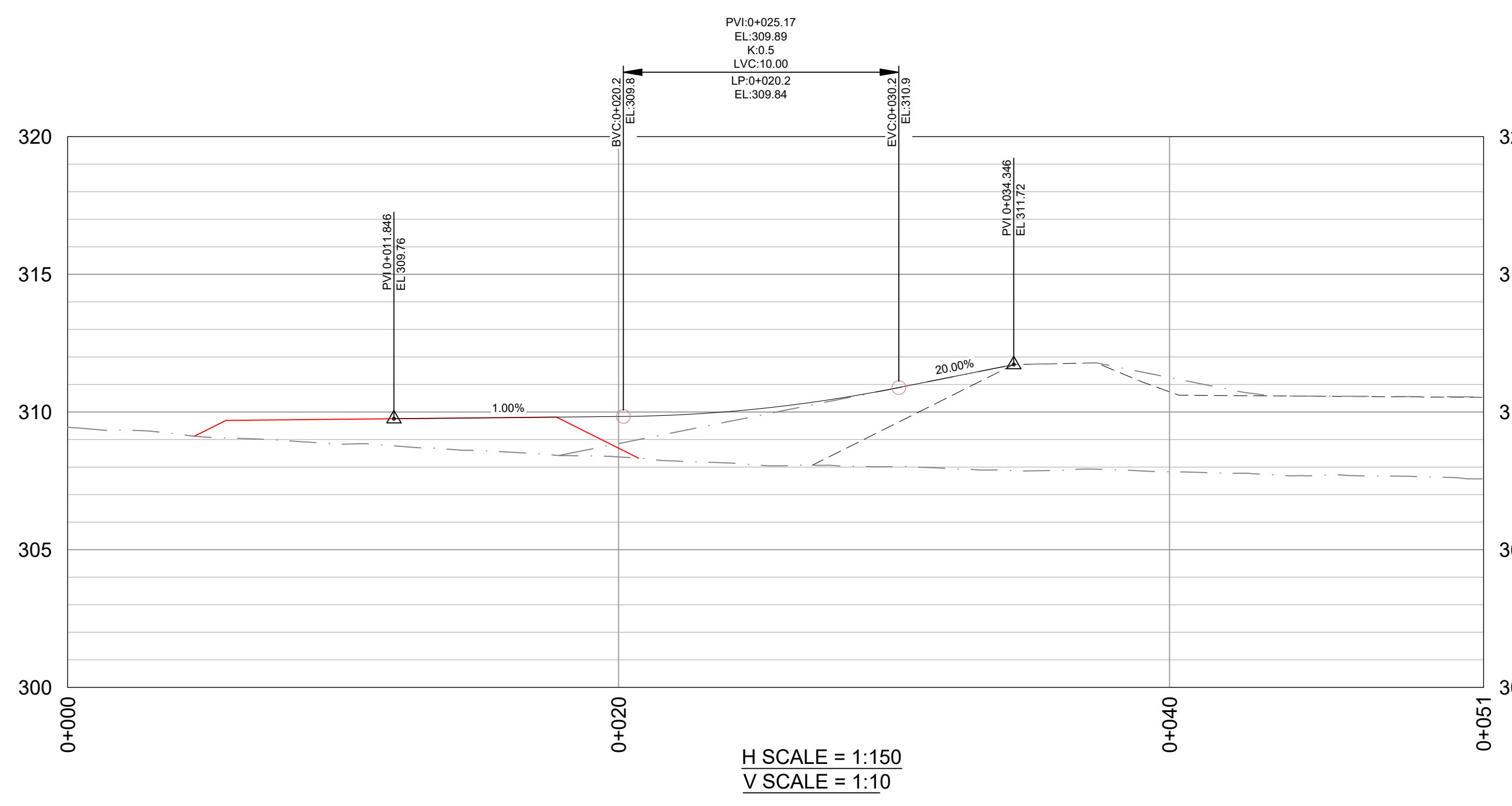
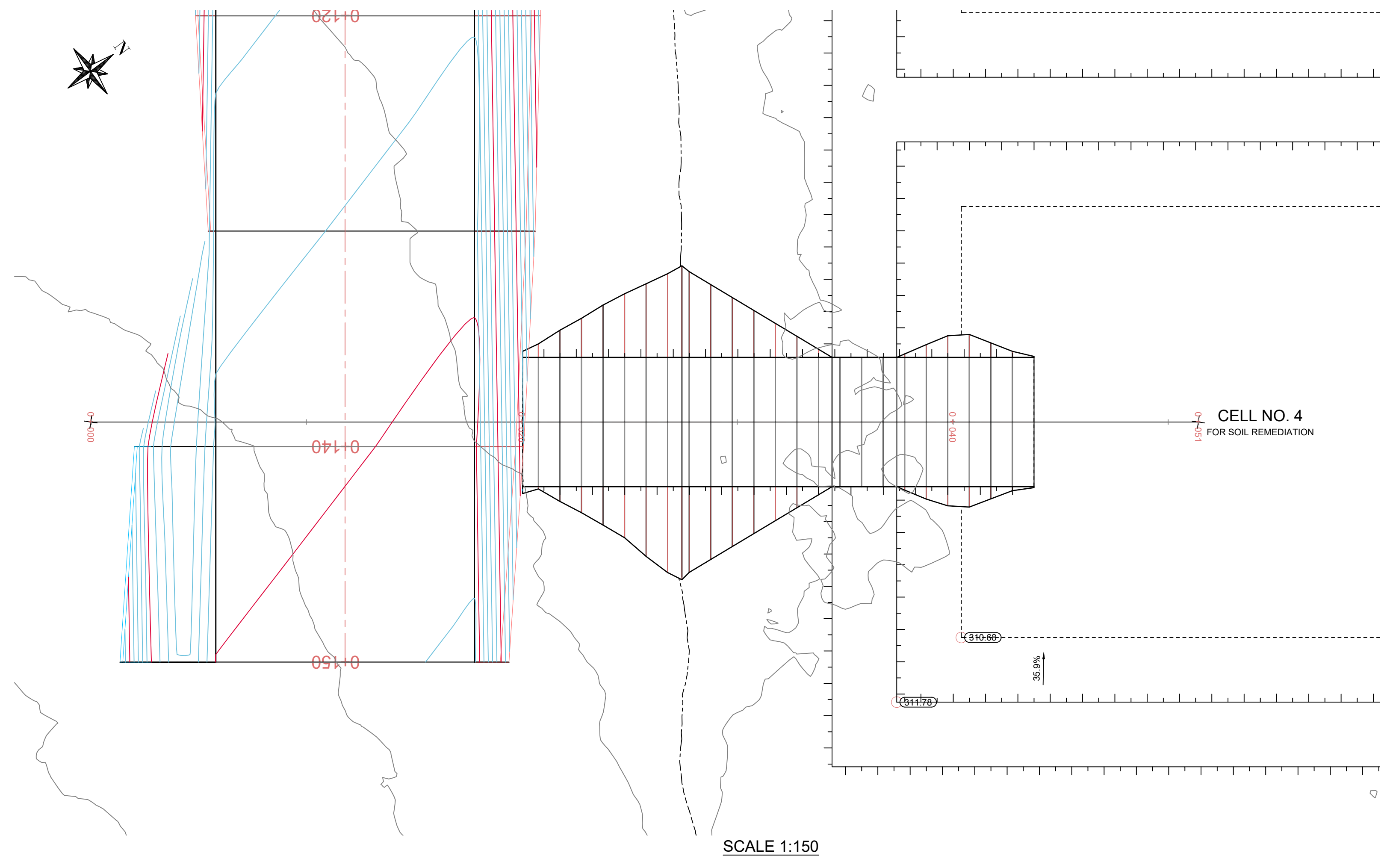
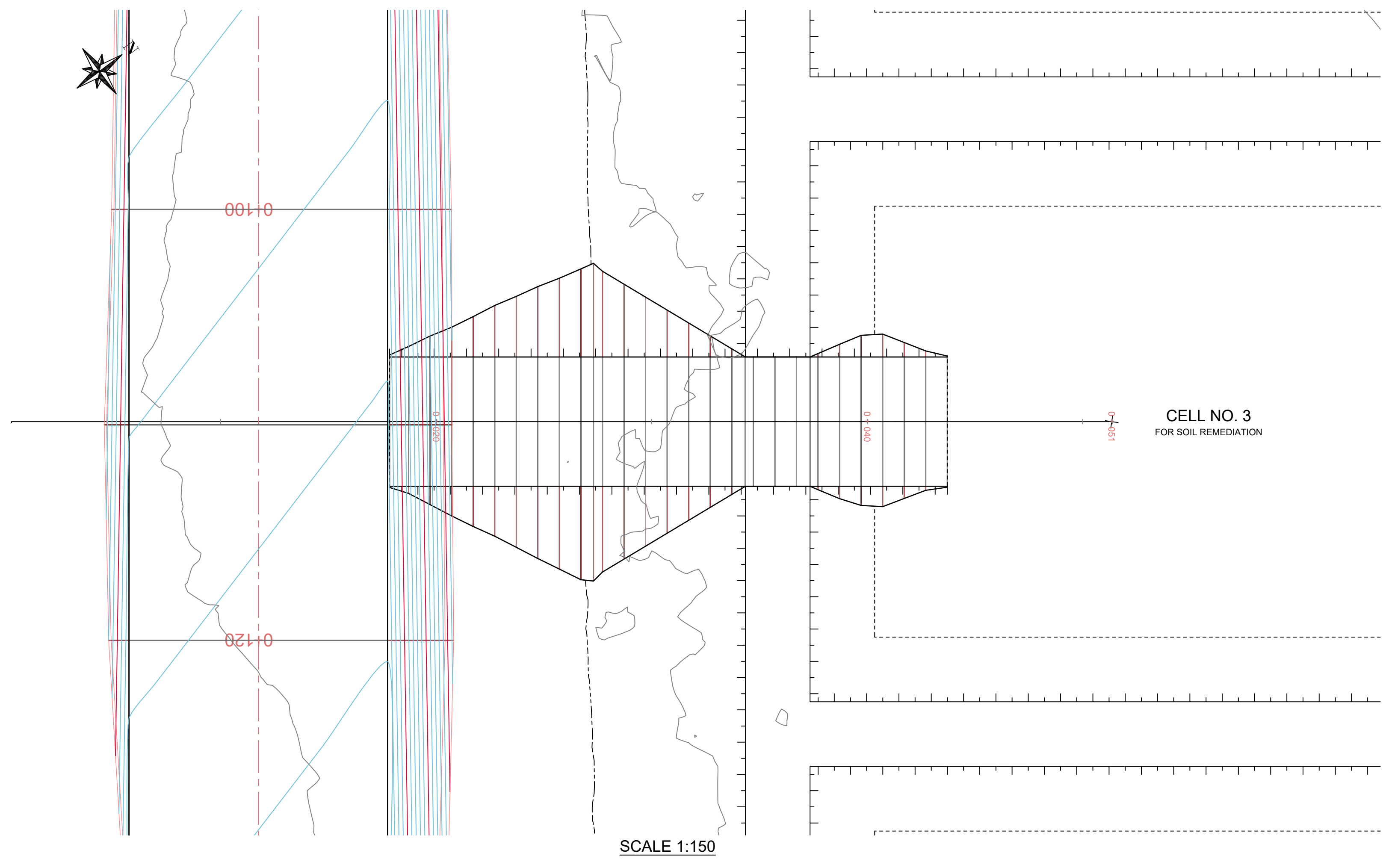
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SCALE: 1:150 1:10

BACK RIVER, NUNAVUT
GOOSE LAKE LAND FARM
B2GOLD CORP.
ACCES RAMP CELL 1 AND 2 P&P

Drawing No.
2500548-C2.1

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BACK RIVER, NUNAVUT
GOOSE LAKE LAND FARM
B2GOLD CORP.
ACCES RAMP CELL 3 AND 4 P&P

Drawing No.
2500548-C2.2

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