

File: 2AM-BRP1831 / D2

March 7, 2025

Merle Keefe Manager, Environment Sabina Gold & Silver Corp. c/o B2Gold Corp. Suite 3400 – 666 Burrard Street Vancouver, BC V6C 2X8 Kristina Benoit Manager, Environmental Permitting Sabina Gold & Silver Corp. c/o B2Gold Corp. Suite 3400 – 666 Burrard Street Vancouver, BC V6C 2X8

Email: <u>mkeefe@b2gold.com</u> Email: <u>kbenoit@b2gold.com</u>

RE: Type A Water Licence No: 2AM-BRP1831 for the Back River Project; B2Gold Nunavut; Design Report for Goose Lake Tote Storage Facility

Dear Mr. Keefe and Ms. Benoit:

On December 31, 2024, the Nunavut Water Board (NWB or the Board) received a Design Report and drawings from B2Gold Nunavut (B2Gold or Licensee) for the Goose Lake Tote Storage Facility. This notification is required under Part D, Item 2 of the type A Water Licence 2AM-BRP1831.

The Goose Lake Tote Storage Facility is required by the Licensee for the storage of oil or lubricant totes. This facility will be located within the already disturbed footprint of the Goose Mine Site. Containment for this facility will be established through a HDPE liner system between two non-woven geotextiles. The Licensee has committed to using only non-potentially acid generating (NPAG) rock for the construction.

Construction activities are planned for the summer season of 2025 to allow for optimal conditions for material placement and compaction. The construction duration will take approximately 8 weeks to complete. Effective sediment and erosion control measures will be installed before starting work to prevent sediment from entering any waterbodies.

On January 2, 2025, the NWB distributed the Design Report for a public review, parties were invited to submit comments by January 30, 2025. Crown-Indigenous Relations and Northern Affairs (CIRNA) and Fisheries and Oceans Canada (DFO) made submissions on January 29 and January 14, 2025 respectively. CIRNA, in their submission stated that they had no comments or concerns at this time.

B2Gold Nunavut replied to interveners' recommendations on February 7, 2025. DFO provided confirmation, on February 13, 2025, that their concerns were addressed by the Licensee's responses.

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Below is a summary of comments from Fisheries and Oceans Canada (DFO)

1. DFO advised the Licensee to abide by the *Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters* if explosives were going to be used in or near aquatic environments.

Response: B2Gold Nunavut stated that they will not be using explosives near Goose Lake, or any other waterbody, for the purpose of constructing the Goose Lake Tote Storage Facility.

2. DFO requested information whether blast-induced water overpressure and particle velocity will be monitored at the nearest point in Goose Lake to verify thresholds are not exceeded.

Response: B2Gold Nunavut stated that they will not be using explosives near Goose Lake, or any other waterbody, for the purpose of constructing the Goose Lake Tote Storage Facility.

3. DFO stated that if this activity meets the criteria for a site-specific review, then B2Gold Nunavut should submit the request for review.

Response: B2Gold Nunavut stated that the current scope for Goose Tote Storage Facility location does not meet the criteria for a site-specific review. B2Gold Nunavut will recheck the criteria for site specific review should there be any scope changes.

4. DFO reminded that it is the proponent's *Duty to Notify* DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption or destruction of fish habitat.

Response: B2Gold Nunavut stated that they appreciate the reminder.

Copies of all documents received in support of the Notice of Construction can be accessed through the NWB's Public Registry and FTP site using the following Link:

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NWB's Review and Decision

The NWB, having fully reviewed the Licensee's request in the context of potential impact of the proposed activities on the freshwater environment, and consistency of the proposed activity in relation to the scope of the Licence, determined that the proposed activity is consistent with the scope of activities considered under the Licence issued to the Project. Therefore, by way of this correspondence, the Board authorizes B2Gold Nunavut to undertake the construction of the Goose Lake Tote Storage Facility.

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Design Report

Further, in keeping with Part D, Item 11 of the Licence's terms and conditions, the submission of post-construction information, including as-built plans and drawings, shall remain applicable to this authorization. The Board also advises that a Construction Summary Report should be provided as per Licence terms and conditions.

The Licensee is advised that the Board's review of this document is a verification that the proposed activity is consistent with the existing terms and conditions of the Licence and more specifically with Part D, and may proceed in accordance with the design specifics and drawings provided. It should be noted that the Board's acceptance is NOT intended or offered as any representation regarding the suitability of the plans nor third-party verification of the design, construction, planning or engineering discussed in the notice of construction and accompanying documents.

Should you have any questions regarding the above, please contact the NWB Licensing Department by email to licensing@nwb-oen.ca or by phone at (867) 360-6338.

Sincerely,

Mohammad Ali Shaikh

Technical Advisor, Nunavut Water Board,

as/rqd

Cc: Distribution List – Back River, Kitikmeot