



DFO Comments: Back River Project 2AM-BRP1831 Llama and Umwelt Lake Dewatering Plan

Laflamme, Anna-Maija <Anna-Maija.Laflamme@dfo-mpo.gc.ca>

Fri, Mar 15, 2024 at 3:39 PM

To: "richard.dwyer@nwb-oen.ca" <richard.dwyer@nwb-oen.ca>

Hello Richard Dwyer,

Below are DFO's comments regarding the Back River Project – Llama and Umwelt Lake Dewatering Plan (File Number: 2AM-BRP1831)

The following comments are in acknowledgement of the request for comments regarding file #2AM-BRP1831, Back River Project – Llama and Umwelt Lake Dewatering Plan.

1. The dewatering plan discusses the schedule for the project (Section 3.0 Schedule, Pg. 2) and outlined that Llama Lake would take ~5-10 weeks and Umwelt would take ~6-10 weeks.

DFO requests to the proponent to confirm whether both lakes will be dewatered during the same time frame or separately.

2. In section 4.0: Pumping Methods and Pipeline, Intake, and Outflow Structure Design. Pg.2 discusses the use of fish screens on the water intake pumps for dewatering the system.
3. DFO confirms that the water intake pipes should be equipped with fish screens to prevent the possible entrainment or impingement of fish to adhere to the Freshwater Intake End-of-Pipe Fish Screen Guideline (DFO ,1995) for all water intake within waterbodies that support fish.

4. In section 5.0: Maximum Pump Rates Pg. 3. The dewatering plan discusses that the dewatering discharge will be directed to the outflows of Llama and Umwelt Lake and then to the Goose Lake.

DFO requests to the proponent to confirm that the Goose Lake Discharge area is at the Goose Lake inflow (east/south).

5. In section 5.0: Maximum Pump Rates Pg. 3. The document outlines the targeted pump rate of $963\text{m}^3/\text{hr}$ (10% of $231,000\text{m}^3/\text{day}$)- actual expected is between $750\text{--}963\text{m}^3/\text{hr}$ and includes erosion prevention measures and inspection procedures.

DFO acknowledges that the proponent needs to minimize the natural re-filling of the system and the pump rate must be able to dewater effectively. The proposed pump rate and erosion prevention should limit scour and bedload movement in the natural downstream channels and flow path to the Goose Lake discharge location. The proponent should be aware that if the pump rate is too high, it could cause a perpetual flooding downstream and need to be adjusted to avoid connecting to other watercourses nearby.

6. In 2023, the fish-out of the Llama-Umwelt system occurred, if remaining fish are observed during inspections and monitoring in the flow path or in the lakes when dewatering occurs, the proponent is required to notify DFO and to discuss next steps.

Thank you,

Anna-Maija LaFlamme

Biologist

Fish and Fish Habitat Protection Program | Programme de Protection du poisson et de son habitat

Fisheries and Oceans Canada | Pêches et Océans Canada

Arctic Region | Région de l'Arctique

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From: Richard Dwyer <richard.dwyer@nwb-oen.ca>

Sent: Friday, February 23, 2024 1:38 PM

To: Merle Keefe <mkeefe@b2gold.com>; Kristina Benoit <kbenoit@b2gold.com>; Chris LeGoffe <CLeGoffe@b2gold.com>

Subject: Back River Project 2AM-BRP1831 Llama and Umwelt Lake Dewatering Plan

Good afternoon,

The Nunavut Water Board acknowledges receipt February 23, 2024 of the attached Dewatering Plan for water licence 2AM-BRP1831, it can also be found at the following link:

<ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-BRP1831%20Sabina/3%20TECH/E%20WATER%20USE>

Parties are invited to submit comments by March 15, 2024.

The Nunavut Water board is aware that a number of web browsers are no longer supporting File Transfer Protocol (ftp). If you are having difficulty accessing our FTP site you may need to download an FTP application. We have been recommending the FileZilla Client below to access the files, which is a free and open source application. A link can be found below:

<https://filezilla-project.org/>

Regards,

Richard

[Redacted Signature]

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