



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Sivumugiaq Street
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Your file - Votre référence
2AM-BRP1831
Our file - Notre référence
GCDOCS #124792338

April 29, 2024

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Response to
Comments on the Back River Project 2AM-BRP1831 Llama and Umwelt Lake
Dewatering Plan**

Dear Richard,

Thank you for the opportunity to review the responses provided by B2Gold Nunavut on the Llama and Umwelt Lake Dewatering Plan, for Type A Water Licence No. 2AM-BRP1831.

Crown-Indigenous Relations and Northern Affairs Canada examined the responses and revised Plan 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 the department's response in the attached Technical Review Memorandum.

If there are any questions or concerns, please feel free to contact me at john.macinnis@rcaanc-cirnac.gc.ca.

Sincerely,

John MacInnis
A/Senior Environmental Assessment Specialist
Impact Assessment Division, Nunavut Regional Office
Crown-Indigenous Relations and Northern Affairs Canada



Technical Review Memorandum

Date: April 29, 2024

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

From: John MacInnis, A/Senior Environmental Assessment Specialist, Impact Assessment Division, Crown-Indigenous Relations and Northern Affairs Canada

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Response to Comments on the Back River Project 2AM-BRP1831 Llama and Umwelt Lake Dewatering Plan

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

Summary

In response to the Nunavut Water Board's request, Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) submitted three (3) comments on the Llama and Umwelt Lake Dewatering Plan on March 15, 2024. B2Gold Nunavut provided its responses to comments on the Llama and Umwelt Lake Dewatering Plan, in accordance with the Type A Water Licence No. 2AM-BRP1831, on April 12, 2024. CIRNAC is satisfied with two (2) of the responses provided by B2Gold Nunavut, but is requesting further clarification on the dewatering schedule.

Table 1. Documents Reviewed and Referenced

Document Title	Author
Llama and Umwelt Lake Dewatering Plan	B2Gold Corp., Version 1.1, April 2024
Llama and Umwelt Dewatering Plan – Responses to Review Comments	B2Gold Corp., April 2024
Back River Project 2011 Hydrology Baseline Report	Rescan, March 2012
Back River Project 2012 Hydrology Baseline Report	Rescan, November 2012
Back River Project 2013 Hydrology Baseline Report	Rescan, January 2014
Back River Project 2014 Hydrology Baseline Report	Rescan, December 2014
Back River Project Responses to 2021 Annual Report Comments	Sabina Gold & Silver Corp., August 19, 2022
Back River Project 2010 Lake Water and Sediment Quality Baseline Report	Rescan, February 2011
Back River Project 2011 Freshwater Baseline Report	Rescan, June 2012
Back River Project 2013 Freshwater Baseline Report	Rescan, February 2014



Results of Review

1. CIRNAC-#R-01: Dewatering Schedule

The Licensee provided clarification on the dewatering schedule for Llama and Umwelt Lakes:

- Dewatering of both lakes is intended to occur simultaneously over the dewatering period, with Llama Lake being dewatered into Umwelt Lake (via Llama Outflow) at the same time that Umwelt is being dewatered into Goose (via the natural discharge pathway to Goose);
- Should one of the lakes develop water quality which is not compliant with discharge criteria, or approach criteria thresholds, the other lake may continue to be dewatered individually to Goose Lake, via discharge to the natural drainages between Umwelt Lake and Goose Lake; and
- Dewatering may continue in 2025 if this activity is not completed by the end of 2024.

CIRNAC is seeking further clarification on the Licensee's proposed dewatering schedule, which appears to have changed. For instance, in a response to the Kitikmeot Inuit Association for the 2021 Annual Report for the Nunavut Impact Review Board, it was noted that:

"The dewatering of Llama Lake and Umwelt Lake are scheduled to occur in sequence; Llama Lake followed by Umwelt Lake. The water from Llama Lake dewatering will be pumped to Umwelt Lake, from where it will be overflow towards Goose Lake through the natural outlet of Umwelt Lake."

In the event that dewatering schedule requires to advance the dewatering of Llama Lake and Umwelt Lake concurrently, the water from Llama Lake dewatering will be discharged directly downstream of Umwelt Lake."

CIRNAC recommends that the Licensee explain why the dewatering schedule has changed and provide information that supported its decision-making in discharging water from Llama Lake to Umwelt Lake (i.e., instead of discharging water from Llama Lake directly downstream of Umwelt Lake).