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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: 2AM-BRP1831/E14

May 22, 2024

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

Email: mkeefe@b2gold.com

RE: Type A Licence No: 2AM-BRP1831 for the Back River Project; B2Gold Corp; Lake Dewatering Plan for Llama and Umwelt Lakes

Dear Mr. Keefe:

On February 23, 2024, the Nunavut Water Board (NWB or the Board) received the Llama and Umwelt Lake Dewatering Plan (Plan), Version 1.0, dated February 2024, from B2Gold Corp. (B2Gold or Licensee) for the dewatering of Llama and Umwelt Lakes at the Back River Project in Nunavut. This notification is required under Part E, Item 14 of the Type A Water Licence 2AM-BRP1831 (the Licence).

B2Gold is planning to dewater Llama Lake to facilitate the construction of the open-pit for their mining operations. Umwelt Lake is being dewatered to facilitate the construction of the Saline Water Pond. The water from both Llama and Umwelt Lakes will be discharged to Goose Lake which is the waterbody downstream, or to the Primary Pond, to be used as start-up water for the Process Plant. Discharge criteria mentioned Part D, Item 26 of the Licence will apply, and water treatment may be required. The Licensee has stated that they have conducted a fish-out program in 2023 at both Llama and Umwelt Lakes, and their associated tributaries and tributary ponds, in anticipation of this dewatering activity.

Part E, Item 4 of the Licence limits the dewatering to a maximum volume of 1,400,000 m³ annually during the Construction Phase. The estimated capacity of Llama Lake is 1,130,000 m³ and Umwelt Lake is 240,000 m³.

The dewatering activity will consist of 3 stages. At Stage 1, the dewatering of water (compliant with discharge criteria in Part D, Item 26) from both lakes will begin. This water will be discharged into Goose Lake. The Licensee anticipates that when approximately 50% of water has been discharged from each lake, the drawdown effects may increase Total Suspended Solids (TSS) to a point that may exceed Licence discharge criteria.

Stage 2 will be initiated at this point. B2Gold have stated that Stage 2 of dewatering would involve the treatment of the water for TSS and/or other water quality issues (such as pH) prior to discharge to Goose Lake. Alternately, Stage 3 of dewatering may be initiated with the storage of non-compliant water, in either Llama or Umwelt Lakes, or in the Primary Water Pond or another water management structure. The decision of whether to continue discharge with treatment (Stage 2), or to contain and manage the non-compliant water (Stage 3), will be made based on operational considerations. Residual water in Umwelt Lake may be used in future by the Process Plant or for dust suppression, or dewatering may be resumed at a later date (2025 open water season), in compliance with the discharge criteria in Part D, Item 26.

The Licensee states that the dewatering of both lakes is estimated to take between 9 and 11 weeks and may be influenced by factors such as freshet start, fish monitoring, variations in water quality, equipment maintenance, weather, and/or pump use priority at site. B2Gold anticipates completing all dewatering in 2024 unless they are required to stop the activity in 2024 and resume it in 2025 as discussed above.

The infrastructure related to dewatering activities will be constructed in advance. Centrifugal pumps will be placed on the lake edge (within containment) with suction hoses suspended in the water column to minimize entrainment of lakebed sediments. This infrastructure will be retrieved at the completion of pumping. Once the dewatering of Llama Lake is complete, lake bottom sediments within the Llama Open Pit boundaries will be excavated and placed in the Umwelt Waste Rock Storage Area (WRSA) footprint.

On February 23, 2024, the NWB distributed the Plan for public review. Interested parties were invited to provide comments or recommendations by March 15, 2024. Submissions were received from the Kitikmeot Inuit Association (KIA), Environment and Climate Change Canada (ECCC), the Department of Fisheries and Oceans (DFO) and Crown-Indigenous Relations and Northern Affairs Canada (CIRNA) on or before March 15, 2024.

B2Gold, after requesting an extension, provided their first set of responses on April 15, 2024. In their response, B2Gold included an updated Llama and Umwelt Lake Dewatering Plan (Updated Plan), Version 1.1, dated April 2024.

Follow-up questions were received from KIA, ECCC and CIRNA on or before April 30, 2024. B2Gold provided their second set of responses on May 14, 2024. By May 22, 2024, all intervenors had confirmed that their concerns were addressed.

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

<ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-BRP1831%20B2Gold/3%20TECH/E%20WATER%20USE>

NWB's Review and Decision

The NWB, having fully reviewed the Licensee's Plan to dewater Llama and Umwelt Lakes 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 and in accordance with Part E, Item 14 of the Licence, the Board authorizes B2Gold to go ahead with the dewatering of Llama and Umwelt Lakes.

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 E, Item 14. 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 document.

The Board expectation is that the Licensee will fully follow and implement all terms and conditions of the Licence associated with dewatering/drainage activities.

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