



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2AM-BRP1831
Our file - Notre référence
GCDOCS#130457288

November 07, 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 Review of the
Licence Amendment Application for B2Gold Nunavut's Back River Project 2025
Winter Ice Road technical memorandum, Type A Water Licence No. 2AM-
BRP1831**

Dear Mr. Dwyer,

Thank you for the October 22, 2024, invitation to review the B2Gold Nunavut's Back River Project amendment application, submitted by the proponent, for Type A Water Licence No. 2AM-BPR1831.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application 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 CIRNAC comments and recommendations in the attached Technical Memorandum.

The applicant shall confirm to the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact me at alexandre.chaikine@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

Alexandre Chaikine
Sr Environmental Assessment Specialist



Technical Review Memorandum

Date: November 07, 2024

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

From: Alexandre Chaikine, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Amendment Application for B2Gold Nunavut's Back River Project, Type A Water Licence No. 2AM-BRP1831

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

A. BACKGROUND

On October 22, 2024, B2Gold Back River Corp. (B2Gold Nunavut) submitted, for the consideration of parties, a Winter Ice Road (WIR) technical memorandum related to the modification of B2Gold Nunavut's water licence 2AM-BRP1831.

The Back River Project (BRP) includes four open pits and four underground mines, an airstrip and mill at the Goose property, a marine laydown area on Bathurst Inlet, and a 160 km long winter road. The most recent amendment under review by the Nunavut Water Board requests authorization for increased water use, increased depth at the Umwelt underground mine, the extension and expansion of airstrips and the addition of a new tailings facility.

The 2025 Winter Ice Road Technical Memo outlines the approach for construction, operations, and closure of the WIR for the 2025 season. This memo has been written to meet the requirements of B2Gold Nunavut's Project Certificate (No. 007), B2Gold Nunavut's Type A Water Licence (2AM-BRP1831), and B2Gold Nunavut's KIA Commercial Lease (KTCL-D18D003).

CIRNAC provides the following comments and recommendations pertaining to the application. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.



Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	WIR season
R-02	Forward Camp
R-03	WIR length
R-04	Water withdrawal locations
R-05	References

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) lists the documents and references reviewed under the submission during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
2025 Winter Ice Road Technical Memorandum for water licence 2AM-BRP1831	B2Gold Nunavut, October 22, 2024

C. RESULTS OF REVIEW

1. WIR season

Comment:

The Introduction of the Technical Memorandum states, “*The 2025 Winter Ice Road Technical Memo outlines the approach for construction, operations, and closure of the WIR for the 2023 season.*”

CIRNAC notes that construction, operations, and closure of the WIR should be for the 2025 season.

Recommendation:

(R-01) CIRNAC recommends that B2Gold Nunavut confirm the year of the WIR season.

2. Forward Camp

Comment:

Section 4 of the Technical Memorandum mentions Forward Camp as follows: “*Like previous seasons, accommodations to support the 2025 WIR construction will utilize a combination of the MLA, a Forward Camp, and the Goose Property.*” The Appendix A map (Figure 1) shows the proposed WIR route connecting the MLA, the George Property Area, and the Goose Property. There is no Forward Camp indicated.



Recommendation:

(R-02) CIRNAC recommends that B2Gold Nunavut provide the board with information on the location of the Forward Camp.

3. WIR length

Comment:

Section 2 of the Technical Memorandum states, *“The WIR between the MLA and Goose Property will be approximately 160 km long.”*

The Appendix A map (Figure 1) shows the proposed WIR route indicating two traffic lanes (or two road options) between the MLA and the southeast end of the Bathurst Inlet, with one lane (or option) stretching along the Bathurst Inlet and adjacent lane (or option) going in parallel west of the first one. The WIR also has two lanes (or options) near the George Property Area.

The Memorandum indicates the volume of water required per km of the IWR. It is unclear if this volume applies to 160 km or 160 km plus the length of additional lanes.

Recommendation:

(R-03) CIRNAC recommends that B2Gold Nunavut:

- Provide information on traffic lanes (or road options) where the WIR has two adjacent lanes as indicated on the Appendix A map.
- Confirm that the WIR length includes 160 km plus the length of additional lanes as indicated on the map (Appendix A).

4. Water withdrawal locations

Comment:

The Licence 2AM-BRP1831 requires: *“The Licensee shall, at least sixty (60) days prior to annual Interconnection Winter Ice Road construction, submit to the Board for review, a technical memorandum. The Memorandum shall include approximate projected routing (subject to changes year to year based on construction and operational conditions), bathymetry, depth, potential locations of possible Water withdrawal, proposed volumes to be extracted, including for the WIR Service/Emergency Camps, and anticipated Water level decreases.”*

Appendix B of the Memorandum indicates the lakes of possible water withdrawal but does not specify the locations.



Recommendation:

(R-04) CIRNAC recommends that B2Gold Nunavut provide information on the water withdrawal locations.

5. References

Comment:

The Technical Memorandum does not reference WIR management information such as road traffic waste management, spill and emergency prevention, services, road signs, snow management, etc.

Recommendation:

(R-05) CIRNAC recommends that B2Gold Nunavut references relevant WIR management documents in the Technical Memorandum as applicable.