



December 12, 2024

Attn: Mohammad Ali Shaikh
Technical Advisor
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
X0B 1J0

Re: B2Gold Nunavut's Comment Responses for the WIR Technical Memo

Dear Ali,

Thank you for the opportunity to respond to comments received on the Back River Project's submission of the WIR Technical Memo. Comments were received from the Kitikmeot Inuit Association (KIA), Crown Indigenous Relations and Northern Affairs Canada (CIRNAC), Environment and Climate Change Canada (ECCC), and Fisheries and Oceans Canada (DFO).

B2Gold Nunavut thanks all parties for their review of our submission. Should you have any questions regarding the above, please contact the undersigned at kbenoit@b2gold.com.

Sincerely,

Kristina Benoit
Manager, Environmental Permitting
B2Gold Nunavut

Enclosure: Comment Responses
 Figure: 2025 WIR Route

Cc: Karén Kharatyan, Director Technical Services, NWB
 Richard Dwyer, Manager of Licensing, NWB
 Merle Keefe, Manager Environment, B2Gold Nunavut



CIRNAC Comment Cover Letter:

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

CIRNAC Recommendation:

Not applicable

B2Gold Nunavut Response:

B2Gold Nunavut confirmed with the NWB that the water used for the Winter Ice Road construction is considered as water diversion, and not "use", as the water is eventually returned to the source. According to S.12 (5) of the Nunavut Waters Regulations, no fees are payable for diversion of waters where water is not otherwise used.

CIRNAC Comment 01:

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.

CIRNAC Recommendation R-01:

CIRNAC recommends that B2Gold Nunavut confirm the year of the WIR season.

B2Gold Nunavut Response:

Yes, the Technical Memo is for the 2025 WIR season.



CIRNAC Comment 02:

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.

CIRNAC Recommendation R-02:

CIRNAC recommends that B2Gold Nunavut provide the board with information on the location of the Forward Camp.

B2Gold Nunavut Response:

An updated WIR figure has been provided at the end of this submission.

CIRNAC Comment 03:

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.

CIRNAC 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).

B2Gold Nunavut Response:

All routes are 2-way traffic. For the 2025 WIR, operations have selected the route noted in the figure at the end of this submission.



CIRNAC Comment 04:

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.

CIRNAC Recommendation R-04:

N/A

B2Gold Nunavut Response:

Individual pump locations are selected in field dependent on access conditions (ice fracturing; ice depth; snow cover, etc.).

CIRNAC Comment 05:

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.

CIRNAC Recommendation R-05:

CIRNAC recommends that B2Gold Nunavut references relevant WIR management documents in the Technical Memorandum as applicable.

B2Gold Nunavut Response:

B2Gold Nunavut has structured the WIR Technical Memorandum to meet the requirements of Part E, Item 13 of the Type A Water Licence. That said, WIR management information such as road traffic waste management, spill and emergency prevention, services, road signs, snow management, etc. has previously been provided and reviewed within the approved Back River Project Management Plans.

**ECCC Comment 1:**

Figure 2 in Appendix B of the Winter Ice Road Technical Memorandum, is intended to display both line plots of monthly average temperature, and bar plots of precipitation accumulating from October 1st to each month end. The temperature axis and component of the figure caption are correctly worded; however, it is customary for the term Total Precipitation to be used to indicate the amount that occurred for each month rather than the cumulative value. ECCC suggests that the term 'Cumulative Precipitation' would be a more accurate title for the precipitation axis on this figure.

ECCC Recommendation 1:

ECCC recommends that, for future reports, the Proponent label this figure as 'A Comparison of Cumulative Precipitation and Mean Air Temperature for [year] versus 'Normals' [date range]', and label the precipitation axis as 'Cumulative Precipitation (mm)' to be a more accurate reflection of the data presented".

B2Gold Nunavut Response:

B2Gold Nunavut appreciates the recommendation for when the next material update is submitted.

