Cambridge Bay
Ikaluktutiak
ᐃᖃᓗᒃᑑᑎᐊᖅ

Kugluktuk
ᖁᒡᓗᒃᑐᖅ

Bathurst Inlet
Kingaok
ᕿᖕᐋᐅᐲ

Bay Chimo
Umingmaktok
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Gjoa Haven
Okhoktok
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Taloyoak
ᑕᓗᕐᔪᐊᖅ

Kugaaruk
ᑰᒑᕐᔪᒃ

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
X0B 1J0

Sent by e-mail:

May 27th, 2025

RE: Tailings Management Plan Version 3 for B2Gold Nunavut's Type A Water licence No:2AM-BRP1831

Dear Robert Hunter, the Kitikmeot Inuit Association's (KIA) geotechnical engineering consultant has reviewed Agnico Eagle's proposed Tailings Management Plan Version 3, and their comments are as follows:

SCOPE OF WORK

The scope of work undertaken by KIA's geotechnical consultant is limited to the review of the following aspects:

- Technical review of Terrestrial Environment with regards to:
    - Geology and Permafrost; and
    - Landforms and Soils;
- Technical review of Tailings and Waste Rock Management; and
- Project review regarding the following technical topics:
    - Geotechnics;
    - Geochemistry (acid rock drainage and metal leaching [ARD/ML]);
    - Technical review of Freshwater Environment with regards to Hydrogeology; and
    - Technical review of Atmospheric Environment with regards to Climate and Meteorology.

OBSERVATIONS

TMP Version

The first version of the TMP, Version 0, was presented by the previous owner, Sabina, in November 2015. As outlined at the beginning of the TMPv3, additional versions were presented in October 2017 and November 2020. However, prior to

submitting this 3rd Version, Version 2.1 was provided to the KIA in April 2022. This version had revised Sections 1 and 2.1 as well as updated references included. Version 2.1 was not listed in the document history, and it is unclear if there are specific reasons why Version 2.1 of the TMP is not referred to in the TMPv3.

Seasonality

In Section 4.1 (page 4-1) of the TMPv3, B2Gold Nunavut states that *"Tailings will be deposited subaqueously with special consideration depending on seasonality of deposition."* However, no specifics are provided in terms of what those considerations include and what criteria have been selected to manage the deposition, such as selection of a specific date, or an air temperature criteria.

Water Cover

In Section 4.1 (page 4-1) of the TMPv3, B2Gold Nunavut states that *"... these facilities will receive a water cover at Closure to create pit lakes, ..."*. In previous TMP versions, a minimum of 5 m water depth was stated. It is unclear whether this is still the plan or if a new water depth has been selected.

Tailings Physical Characteristics

Compared to previous versions of the TMP, the physical properties of the tailings presented in Section 4.1.1 (pages 4-1 and 4-2) have changed. The solids content in the previous version has been assumed to be 49% (by weight), the tailings solids specific gravity to be 2.9, and the settled density to be 1.2 t/m3. B2Gold Nunavut does not provide details why the tailings physical characteristics have changed compared to previous versions of the TMP.

REQUESTS

Following the review of the TMPv3 KIA's consultant suggests that B2Gold Nunavut:

- updates this version's history of the TMPs developed for the project;
- provides clarification on the seasonal management of the tailings deposition;
- confirms the minimum depth of the pit lake water cover at closure; and
- provides clarification on the changes introduced to the tailings physical characteristics.

Thank you.

John Roesch

John Roesch, P.Eng.

Senior Hope Bay Project Officer
Kitikmeot Inuit Association, Department of Lands and Environment

Cc Wynter Kuliktana, Director, KIA, Department of Lands and Environment