

File: 2AM-BRP1831 / B12

June 20, 2025

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 Water Licence No: 2AM-BRP1831; Tailings Management Plan (ver. 3.0) for the Back River Project

Dear Mr. Keefe:

On May 6, 2025, the Nunavut Water Board (NWB or Board) acknowledged the receipt of the Back River Mine - Tailings Management Plan ver.3.0 (updated Plan), dated April 2025, from B2Gold (previously Sabina Gold and Silver Corp.) and sent it out for review until May 27, 2025.

According to B2Gold, the reason for this update was to align the Tailings Management Plan with the updated Water Management Plan as well as to reflect minor changes in tailings deposition volumes and timing.

Submissions<sup>1</sup> were received from the Kitikmeot Inuit Association (KIA) and Fisheries and Oceans Canada (DFO) on or before the deadline of May 27, 2025. In their submission, DFO advised the Board that they had no comments or concerns related to this Plan at this time.

B2Gold provided responses to the Interveners' recommendations on June 6, 2025. On June 13, 2025, the KIA confirmed that their concerns were addressed by B2Gold's responses.

<sup>&</sup>lt;sup>1</sup> Kitikmeot Inuit Association (KIA), May 27, 2025; Fisheries and Oceans Canada (DFO), May 13, 2025

## Summary of comments:

Kitikmeot Inuit Association (KIA) May 27, 2025

1. KIA requested that B2Gold update the version history for this plan.

<u>Response:</u> B2Gold agreed to update the version history in the next update for the Tailings Management Plan (TMP).

2. KIA requested that B2Gold provide clarification on the seasonal management of the tailings deposition.

Response: B2Gold stated that "the ultimate deposition of tailings will remain sub-aqueous. During sub-zero conditions, the tailings discharge line will be positioned directly above the tailings pond to prevent ice entrainment and reduce the risk of pipeline damage, such as rupture from ice uplift forces. Once discharged, the warm tailings effluent will settle beneath the ice cover and remain sub-aqueous within the facility. This approach is consistent with current operating procedures at Agnico Eagle's Meadowbank Mine."

3. KIA requested that B2Gold clarify the minimum depth of pit lakes at closure.

<u>Response</u>: B2Gold confirmed that the minimum depth of pit lakes at closure will be 5 meters, and is stated in the Interim Closure and Reclamation Plan. B2Gold will add this in the next version of the Tailings Management Plan.

4. KIA requested that B2Gold clarify the changes in the physical characteristics of the tailings compared to the previous version of the Tailings Management Plan.

Response: B2Gold stated that they conducted a laboratory testing program on tailings samples in 2024. The results indicated "a slight increase in specific gravity, solids content, and settled density compared to the values used in previous versions of the TMP, reflecting updated and more representative data"

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

https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-BRP1831%20Sabina/3%20TECH/F%20WASTE%20DISP/

As stated above, B2Gold has submitted an updated plan entitled Back River Mine - Tailings Management Plan ver. 3.0, on May 6, 2025. The NWB has reviewed the updated Plan, and finds it functional and generally satisfying Water Licence requirements. By copy of this letter, the Board provides its approval through the Board **Motion No. 2025-A1-006**, dated June 20<sup>th</sup>, 2025, as per Part B, Item 12 of Water Licence. The NWB encourages the Licensee to address the intervenors' recommendations in the next revision of the approved plan.

Should you have any questions regarding the above, please contact the NWB Licensing Department by email to <a href="mailto:licensing@nwb-oen.ca">licensing@nwb-oen.ca</a> or by phone at (867) 360-6338.

Sincerely,

Mohammad Ali Shaikh Technical Advisor, Nunavut Water Board

as/rqd

Cc: Distribution List – Back River