

Environmental Protection Operations Directorate  
Prairie & Northern Region  
5019 52<sup>nd</sup> Street, 4<sup>th</sup> Floor  
P.O. Box 2310  
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 115/002  
NWB File: 2AM-BRP1831



July 26, 2024

via email at: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

**RE: 2AM-BRP1831 – B2Gold – Back River Gold Mine – Proponent Responses to Comments Regarding the Marine Laydown Area (MLA) Tank Farm Modification Request**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Proponent Responses to Comments regarding the Marine Laydown Area (MLA) Tank Farm Modification Request.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

**1. Tank Security Features**

Reference(s)

- Section 2A: Description of the Facilities and/or Works to be Constructed, Application for MLA Tank Farm Modification (Phase 3: Addition of Tank 5), B2Gold Nunavut, May 28, 2024
- Section 2D: Description of Any Monitoring Required, Including Sampling Locations, Parameters Measured, and Frequencies of Sampling, Application for MLA Tank Farm Modification (Phase 3: Addition of Tank 5), B2Gold Nunavut, May 28, 2024



- B2Gold Nunavut's Comment Responses for the MLA Tank Farm Modification (Phase 3: Addition of Tank 5), July 15, 2024

Comment

The Proponent's response expands on the monitoring practices that ensure the tanks are performing as designed, but does not provide further details on the full scope of safety features that will be equipped with the new tank, including corrosion protection, overfill protection, leak detection, or other measures that would reduce the risks of accidents and malfunctions.

ECCC Recommendation(s)

ECCC recommends that the Proponent provide detailed information in the Tank Farm Modification Application document, on the safety features of the proposed new fuel tank. This should encompass all safety features like corrosion protection, overfill protection, leak detection, and other relevant measures to minimize the risks of tank failure.

ECCC acknowledges all other responses provided by the Proponent, and considers the corresponding comments resolved.

If you need more information, please contact Stephinie Mallon at [Stephinie.Mallon@ec.gc.ca](mailto:Stephinie.Mallon@ec.gc.ca).

Sincerely,

*[original signed by]*

Stephinie Mallon  
Acting Senior Environmental Assessment Officer

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)