

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

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



November 7, 2024

via email at: 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 Nunavut – Back River Project – Goose Property Tank Farm Modification (Phase 2: Addition of Tank 5)

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Tank Farm Modification.

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. Discrepancies in Minimum Distance Between the Tank and the Inner Crest Line of the Berms

Reference(s)

- Section 2: Goose Property Phase 2 Tank Farm Expansion, Application for Goose Property Tank Farm Modification (Phase 2: Addition of Tank 5), October 18, 2024

Comment

Table A-1: Goose Property Tank Farm Design Criteria, indicates that the minimum distance between the tank and the inner crest line of the berms must be 15 m, as per the "National



Fire Code of Canada (2020)". However, later on in the text for Section 2, it states that the "spacing between Tank 5 and the inner crest line of Phase 2 berms will be 5.5 m."

ECCC Recommendation(s)

ECCC requests that the Proponent address the discrepancy between the proposed 5.5 m distance between Tank 5 and the inner crest line of the berms, and the 15 m requirement from the National Fire Code of Canada (2020).

If you need more information, please contact Stephinie Mallon at Stephinie.Mallon@ec.gc.ca.

Sincerely,

Stephinie Mallon
A/ Senior Environmental Assessment Officer

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