Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2AM-BRP1831
Our file - Notre référence
GCDocs# 149668684

August 31, 2026

Richard Dwyer
Manager of Licensing
Nunavut Water Board
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Re: Crown-Indigenous Relations and Northern Affairs Canada's Reply to Technical Review Responses for the Type A Water Licence No. 2AM-BRP 1831 Modification Application for Goose Project

Dear Richard,

Thank you for the August 24, 2026 invitation to reply to responses provided by B2Gold Nunavut (B2Gold) to the technical review of modifications proposed for their Type A Water Licence No. 2AM-BRP1831. The first section of this letter is the requested reply and the second section provides an update on Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) revision of the security reclamation estimate.

REPLY TO TECHNICAL REVIEW RESPONSES

B2Gold updated the Water, Waste Rock and Interim Closure Plans to incorporate changes to their mine plan. CIRNAC provided a technical review of the modifications to the Nunavut Water Board on July 31, 2026 with 16 recommendations. B2Gold's August 18, 2026 response describes how they propose to address CIRNAC's recommendations.

The information provided helped address concerns we had raised and the graph figures were particularly effective at conveying predictions. Ten of the responses involve future updates to the various plans and CIRNAC will be looking to review these plans when the changes are made. Presently we are looking for further information on three recommendations to address our comments:

1) **R-02 Updating segregation criteria for potentially acid generating rock:** B2Gold responded they would present an updated potentially acid generating / non-potentially acid generating (PAG/NPAG) segregation criteria for waste rock for the Llama deposit, based on data presented in attachment C of the modification application, in the next iteration of the Waste Rock Management Plan. The prevention

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of acid rock drainage and potential impacts to water quality relies on accurately distinguishing PAG and NPAG.

CIRNAC recommends: B2Gold provide their proposed updated PAG/NPAG segregation criteria for the Llama deposit at this time so that it can be discussed and agreed on prior to initiating mining at Llama pit, planned for Q4 of this year.

2) **R-01 Waste rock quantities and storage capacity:** Tables 1 to 3 of B2Gold's response allowed CIRNAC to compare the site wide waste rock predicted volumes and capacity, and helped us understand the changes in predicted PAG/NPAG material ratio. According to Table 3, the Umwelt open pit PAG/NPAG ratio prediction changed slightly between 2022 and 2026, from 52%-to-48% to 47%-to-53%. However, most of the material mined at Umwelt to date has been PAG and the reported ratio is 97%-to-3%.

   Since the long term strategy for waste rock storage is encapsulating PAG waste rock with NPAG waste rock, the relative quantities of each are important for executing proposed plans.

CIRNAC recommends: B2Gold explain why the PAG/NPAG ratio of the material mined to date from the Umwelt pit differs significantly from predictions, and discuss how these volumetric changes are to be accounted for in the waste rock storage plans.

3) **R-07 Saline water management:** Figure 1 present inflow and outflow volumes to the Saline Water Pond (SWP) and the text explains "*during operations, most of the water stored in the pond is derived from non-saline sources (runoff, snowmelt, and direct precipitation).*" Though the phased construction of the SWP dam will retain more water than the original Umwelt lake volume, it is not clear why the volume of non-saline inflows to the SWP approximately triples between years 1 and 4 since they are comprised of runoff, snowmelt and precipitation and would contribute to lake inflows regardless of the dam. The flow diagrams in appendix B of the Water and Load Balance indicate no fresh/non-contact or contact water will be directed to the SWP. Thorough accounting in the management of saline water is critical to protect freshwater resources.

CIRNAC recommends: B2Gold explain the reason non-saline water inputs to the SWP increase significantly over the first four years of operations.

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RECLAMATION SECURITY ESTIMATE UPDATE

As related by Macoura Koné in her August 27, 2026 email to you, CIRNAC and B2Gold are continuing constructive discussions regarding the reclamation security estimate. Based on our conversation to date, it appears further changes to the Interim Closure and Reclamation Plan will be required. We will share conclusions of the security negotiations with the Nunavut Water Board and keep you informed of the proceedings.

Accounting for progressive reclamation in the security cost estimate is a topic still under discussion. CIRNAC does not believe this should delay the progressive reclamation activities presented in the 2026 Progressive Reclamation Work Plan. However, the plan could be improved by including:

- activity-specific criteria to confirm completion of reclamation, as the current plan identifies evidence requirements but does not specify acceptance criteria;
- planned timing for the reclamation activities described in Section 1.4 to provide a wholistic picture of activities and distinguish those intended to occur in the upcoming reporting period from those that will occur over the project duration;
- annual variance reporting including activities planned, completed, and deferred, as well as why activities were deferred;
- waste rock storage area cover reconciliation with total planned, completed and remaining waste rock storage area cover volumes and areas (with footprint areas of PAG and NPAG cover), in addition to the current year's planned volume and figures presently in the plan;
- a reclamation liability reconciliation table, with the following information for each project component: planned quantities, completed quantities, remaining quantities and associated change in closure liability; and
- a security credit eligibility section with the following information for reclamation activities completed: work completed, evidence provided, remaining liability and whether a security adjustment is being proposed.

If there are any questions or concerns, please contact me at (587) 338-6428 or sarah.forte@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

Sarah Forté
Regional Coordinator