Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2AM-BRP1831
Our file - Notre référence
GCDocs# 150632689

October 16, 2026

Richard Dwyer
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Nunavut Water Board
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Re: Crown-Indigenous Relations and Northern Affairs Canada's Reply to 2nd Round of Technical Review Responses for the Type A Water Licence No. 2AM-BRP1831 Modification Application for Goose Project

Dear Richard,

Thank you for the September 29, 2026 invitation to reply to the 2nd round of responses provided by B2Gold Nunavut (B2Gold) regarding 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) work on the security reclamation estimate.

REPLY TO 2ND ROUND TECHNICAL REVIEW RESPONSES

B2Gold updated the Water, Waste Rock and Interim Closure Plans to incorporate changes to their Goose project 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 described how they proposed to address CIRNAC's recommendations. CIRNAC submitted follow-up comments on August 31, 2026 and B2Gold provided a second round of responses on September 29, 2026.

The information provided helped address two concerns but two remain outstanding.

R-01 Waste rock quantities and storage capacity: The explanation of use of NPAG waste rock for construction addresses our concerns about the PAG/NPAG ratio of waste rock from Umwelt Pit.

R-02 Updating segregation criteria for potentially acid generating rock: B2Gold propose leaving the segregation criteria for potentially acid generating (PAG) waste rock

from the Llama deposit unchanged until samples gathered this summer are analyzed. The current criteria require rock to have a neutralization generation potential/acid generation potential (NP/AP) ratio less than 3 and total weight percent sulphur greater than 0.15% to be classified as PAG. CIRNAC is concerned that these criteria could misclassify rock from the Llama deposit and potentially lead to PAG rock being used for construction or left uncovered in waste rock storage areas. As noted in the NPAG/PAG Segregation Criteria Update Memo provided with this modification request: "*All five samples that were classified as NPAG by the 2015 criteria but illustrated acid-generating behaviour in the extended HCT data set were samples from the Llama deposit*".

B2Gold's September 29th response informs that "*investigations are assessing whether a lower NP/AP threshold may be appropriate*". It does not discuss the timeline for the assessment or whether the appropriateness of a more stringent threshold is also being considered.

CIRNAC recommends: B2Gold provide:

a. A timeline for sharing the results of their evaluation of PAG/NPAG segregation criteria for rocks from the Llama deposit;
b. Consideration of the appropriateness of more stringent PAG/NPAG segregation criteria for Llama waste rock in their evaluation; and
c. Measures that will be taken in the interim to prevent rock from the Llama deposit classified as NPAG using the current criteria and which showed acid generating and metal leaching behaviour in the humidity cell tests from being used in construction or left exposed in waste rock storage areas.

R-07 Saline water management: The explanation provided on the changes of runoff coefficient in the salt water pond catchment area addresses our concerns.

R-09 Predicted groundwater inflows: The Goose Project - 2026 Water and Load Balance Model Groundwater Sensitivity Analysis Memo provides more detail on predicted groundwater inflows. Specifically, on the differences in groundwater volumes and salinity from the pit and undergrounds that will need to managed in the base case (Scenario 1) and conservative case (Scenario 2b). The predicted groundwater inflows are an important input to the Water and Load Balance Model (WLBM) as this saline water will have to be managed separately from other contact water.

Saline water storage capacity is critical and since it is relatively limited, conservative assumptions are typically used to estimate requirements. Figure 6-1 of the 2026 WLBM, shows that the 75th percentile of saline water storage volume for half of Year 3 is already at or above the 1.1 M-m^3 maximum available saline water pond (SWP) storage capacity using Scenario 1. The probability of saline water volume exceeding capacity is even greater under Scenario 2 since the Sensitivity Analysis concluded: "*The increased groundwater inflows result in slightly greater storage within the SWP during the critical period between Year 1*

and Year 3 (13% greater storage under Scenario 2 relative to Scenario 1 for average climate conditions)."

Two options which could be used to manage excess saline water are not planned until further in the mine life. Reverse osmosis treatment of saline water to reduce SWP volumes is scheduled to being in Q3 of Year 4, and a disposal of saline water will begin in Year 9 when Goose Main Pit is complete. It is not clear how excess saline water will be handled in the first three years if groundwater flows greater than the base case are encountered or if Years 2 or 3 are wet years.

> **CIRNAC recommends:** B2Gold detail how they will manage saline water in the first years if the saline water volume exceeds SWP capacity, including how long it would take them to implement those measures.

RECLAMATION SECURITY ESTIMATE UPDATE

We are continuing to work on the reclamation security estimate and associated Interim Closure and Reclamation Plan, and hope to meet with B2Gold in the coming days for further discussions. We will keep the Nunavut Water Board apprised of our meetings and share our conclusions when they are ready.

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