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**B2GOLD CORP.**

Suite 3400, Park Place, 666 Burrard Street  
Vancouver, British Columbia, Canada, V6C 2X8  
Telephone: +1 604 681 8371  
[www.b2gold.com](http://www.b2gold.com)



## MEMO

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**From** Chris LeGoffe, Superintendent, Environment, B2Gold Nunavut  
Macoura Koné, Manager, Environment, B2Gold Nunavut

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**To** Richard Dwyer, Manager of Licensing, Nunavut Water Board (NWB)

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**Cc** Ali Shaikh, Technical Advisor, Nunavut Water Board (NWB)

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**Ref.** Spill Contingency Plan for Type B Water Licenses (2BE-GEO2530, 2BE-GOO2028, 2BE-MLL2328)

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**Date** 20 May 2026

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**Subject** B2Gold Nunavut Response to CIRNAC's Review of Spill Contingency Plan for Type B Water Licenses

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Dear Mr. Dwyer,

On May 06, 2026, B2Gold Nunavut (B2Gold) was required to provide responses to comments regarding the Spill Contingency Plan for three Type B exploration water licenses (2BE-G002028, 2BE-GEO2530, and 2BE-MLL2328). B2Gold reviewed the documents received from Fisheries & Oceans Canada (DFO) and Crown Indigenous Relations & Northern Affairs Canada (CIRNAC). Of the two (2) regulatory bodies' responses, only CIRNAC provided comments and recommendations. DFO did not have any comments or concerns related to the Spill Contingency Plan for the Type B exploration water licenses.

B2Gold is providing in the following sections, responses including actions taken and paths forward regarding CIRNAC' comments and recommendations. Should you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Macoura Koné", is written over a horizontal line.

**Macoura Koné, Ph.D, P.Geol., P.Geo.**  
Manager, Environment  
B2Gold Nunavut

Cc: Dan Gagnon, General Manager, B2Gold Nunavut  
Jamie Richards, Operations Manager, B2Gold Nunavut  
Clinton Wakefield, Operations Manager, B2Gold Nunavut

<b>Interested Party:</b>	<b>Crown Indigenous &amp; Northern Affairs Canada (CIRNAC)</b>	<b>TRC NO.:</b>	<b>CIRNAC-R-01</b>
<b>Re:</b>	<b>Secondary Containment</b>		

## 1. SECONDARY CONTAINMENT

### **CIRNAC's Comment:**

Secondary containment is spoken to throughout the plan however the dimensions and materials used are not detailed. The concern is that CIRNAC cannot evaluate these as a spill contingency without additional information.

### **CIRNAC's Recommendation:**

(R-01) CIRNAC recommends the applicant describe their secondary containment locations, materials, and dimensions ensuring adequate materials and necessary volumes are met. This is to include secondary berms, frequently used temporary storages, and mobile kits to name a few.

### **B2Gold Nunavut's Response:**

B2Gold Nunavut acknowledges CIRNAC's request for additional details. Secondary containment locations, materials and dimensions are provided in the following sections.

To ensure adequate protection and volumetric capacity across our exploration properties, B2Gold Nunavut utilizes various containments and strategies tailored to the specific requirements of each program operating under each exploration water license to ensure adequate protection and volumetric capacity across our exploration properties. All secondary containment systems are selected to meet or exceed the required capacity of 110% of the largest stored volume to ensure effective spill mitigation, where possible.

### **Goose Lake (2BE-GOO2028)**

For materials that are staged at the Goose Lake Exploration camp, all petroleum hydrocarbons are stored in double walled tanks. Secondary containment includes one earthen berm that is lined with HDPE liner to ensure there's an impermeable barrier. This secondary containment is used to store drums and totes of waste oils and fuels. Additionally, rigid polyethylene spill trays are used for hoses, and polyethylene spill pallets are used for storing drums and totes that are otherwise outside of a dedicated secondary containment. Toyo stoves that rely on 205L drums are also placed in rigid polyethylene secondary containments. 45-gallon spill kits are also strategically placed around the exploration area in the event a spill outside secondary containment occurs. Figure 1 illustrates where these spill pallets, spill kits, and secondary containments are located at the Goose Exploration Camp.



Figure 1: Goose Lake Exploration Camp Spill Kit Locations (2BE-GOO2028)

### George Lake (2BE-GE02035)

For materials that are staged at the George Lake Exploration camp, all petroleum hydrocarbons are stored in double walled tanks. Additional petroleum hydrocarbon storage is within industrial grade instabermis (highly portable, chemical resistant, PVC/polymer). Additional secondary containment materials include rigid polyethylene spill trays, and polyethylene spill pallets. Fuel drums are also stored in rigid polyethylene secondary containments. Toyo stoves that rely on 205L drums are also placed in rigid polyethylene secondary containments. 45-gallon spill kits are also strategically placed around the George Lake camp in the event a spill outside secondary containment occurs. Figure 2 illustrates where these spill pallets, spill kits, and instabermis are located at the George Lake Exploration Camp.



Figure 2: George Lake Camp Spill Kit Locations (2BE-GE02530)

**Wishbone Malley (2BE-MLL2328)**

Secondary containments are used on an as-needed basis under this exploration license as there is no permanent or temporary camps under this license currently. All fuel is transported in double-walled tanks, and portable 45-gallon spill kits that are staged at each location in the event of an uncontrolled release. Additional information regarding dimensions containment types is provided below in Table 1.

**Table 1: Secondary Containment and Spill Response Materials**

<b>License</b>	<b>Primary Containment Types</b>	<b>Dimensions</b>	<b>Staging &amp; Management</b>
2BE-GOO2028 (Goose)	Earthen/HDPE Berms Instaberms Spill Trays Spill kits	Berm: 30 x 50' Trays: 2' x 3' Pallets: 3.5' x 3.5' Spill kits: 45 gal	Staged at Goose Exploration Camp; deployed to field as required.
2BE-GEO2530 (George Lake)	Large Instaberms Spill Pallets Spill Trays Spill kits	Instaberms: 20' x 30' Pallets: 3.5' x 3.5' Trays: 2' x 3' Spill kits: 45 gal	Maintained at George Lake Camp; subject to regular integrity inspections.
2BE-MLL2328 (MLL)	Spill Trays Portable Instaberms Spill kits	Instaberms: 20' x 30' Pallets: 3.5' x 3.5' Trays: 2' x 3' Spill kits: 45 gal	Sourced from Goose Mine inventory as no permanent camp currently exists. These materials are taken on an as- needed basis.

<b>Interested Party:</b>	<b>Crown Indigenous &amp; Northern Affairs Canada (CIRNAC)</b>	<b>TRC NO.:</b>	<b>CIRNAC-R-02</b>
<b>Re:</b>	<b>Distance to Nearby Waterbodies</b>		

## 2. DISTANCE TO NEARBY WATER BODIES

### **CIRNAC's Comment:**

While B2Gold mentions the distance of required items and activities to nearby waterbodies, the distances and wording are inconsistent where some fall below standard. There concern is the standard is specific and required by all three licenses.

Examples from the plan include but are not limited to

In section 1.6 it states that

“For on-ice drilling, excess return water is pumped to a point on shore more than 31 m from the water body.”

In section 7.2, Table 3, it states that

“All storage will occur in area 30m from waterways”.

In section 6.6.3 it states that

“at least 30 m away from any body of water or ditch.”

In section 7.2, Table 2, it states that

“All refueling will occur in area at least 31m from waterways in designated areas”.

### **CIRNAC's Recommendation:**

(R-02) CIRNAC recommends B2Gold ensures the standard of a minimum distance of thirty-one (31) meters from the ordinary High-Water Mark of any water body is kept at all sites and activities as required by licenses.

### **B2Gold Nunavut's Response:**

B2Gold Nunavut acknowledges the inconsistencies in the wording and setback distances in the Spill Contingency Plan dated April 2025. This Plan will be updated accordingly this year to ensure areas designated for waste disposal are located at a minimum distance of thirty-one (31) meters from the ordinary High Water Mark of any water body such that the quality, quantity or flow of water is not impaired as required by **PART D, Condition 1 of B2Gold Type B Water Licenses No. 2BE-GEO2530; No. 2BE-GEO2028 and No. 2BE-MLL2338**. The updated Spill Contingency Plan will be included in the 2026 Type B Annual Reports.

Interested Party:	Crown Indigenous & Northern Affairs Canada (CIRNAC)	TRC NO.:	CIRNAC-R-03
Re:	Snow Thickness		

### 3. SNOW THICKNESS

#### CIRNAC's Comment:

Previous Spill Contingency Plans stated

"Snow thickness will be a minimum of 15 cm on land to prevent damage to soil and vegetation".

This current plan reduces this distance to 10 cm. The concern is that there was no mention or justification for this change.

#### CIRNAC's Recommendation:

(R-03) CIRNAC recommends the applicant provide justification for the lowered standard and explain how this new standard prevents damage to soil and vegetation in an acceptable capacity.

#### B2Gold Nunavut's Response:

B2Gold Nunavut appreciates CIRNAC's thorough review of the Spill Contingency Plan. This Plan dated April 2025, references 10 cm minimum for snow thickness rather than 15 cm to ensure consistency and compliance with:

- **Condition D(a), Schedule C of Framework Agreement between the Kitikmeot Inuit Association (KIA) and Sabina Gold & Silver Corp. (now B2Gold)**, which states: *"A winter road will not be used where a constructed snow depth does not meet minimum 10 cm threshold of snow unless approved in writing by KIA."*
- **Condition 31(1)(d) of CIRNAC Land Use Permit N2025F0020** which states: *"The Permittee shall construct and maintain winter roads with a minimum of ten (10) centimetres packed snow at all times during this land use operation."*

<b>Interested Party:</b>	<b>Crown Indigenous &amp; Northern Affairs Canada (CIRNAC)</b>	<b>TRC NO.:</b>	<b>CIRNAC-R-04</b>
<b>Re:</b>	<b>Malley Spill Kits</b>		

#### 4. MALLEY SPILL KITS

**CIRNAC's Comment:**

Spill kit locations and maps are provided for Goose, George and the Marine laydown properties but are not provided for the Malley camps or activities. There is a concern that these were left out as the spill kit locations were mentioned in the last Malley Spill Contingency Plan.

**CIRNAC's Recommendation:**

(R-04) CIRNAC recommends the applicant provide spill kit locations and maps to 2BE-MLL2328 related camps and activities to ensure 2BE-MLL2328 has adequate spill coverage.

**B2Gold Nunavut's Response:**

B2Gold Nunavut acknowledges CIRNAC's comment and is providing the following response. For all field programs that occur on the Wishbone Malley property (2BE-MLL2328) spill kits are flown to each drill target or exploration area and removed when locations change or at the end of the field season. This explains the reason spill kit locations and maps were not provided for this location.

<b>Interested Party:</b>	<b>Crown Indigenous &amp; Northern Affairs Canada (CIRNAC)</b>	<b>TRC NO.:</b>	<b>CIRNAC-R-05</b>
<b>Re:</b>	<b>Change Log</b>		

## 5. CHANGE LOG

### CIRNAC's Comment:

Changes have been noted by CIRNAC between previous spill plans for the three licenses but have not been noted directly in the new plan. The concern is that changes need review for consistency and to ensure standards are kept.

### CIRNAC's Recommendation:

(R-05) CIRNAC recommends the applicant provide a change log or list of changes between the new Spill Contingency Plan and the recent previous plans of the involved licenses.

### B2Gold Nunavut's Response:

B2Gold Nunavut acknowledges that previous and current iterations of the spill contingency plan have lacked a change log. B2Gold Nunavut has reviewed both the 2020 and 2025 Spill Contingency Plan and prepared a change log (Table 2) for the changes made between the 2020 version and the most current 2025 version. An updated version of the Spill Contingency Plan will be prepared and submitted along with the 2026 Type B Annual Reports, which will contain a formalized change log, which will be maintained going forward.

**Table 2: Change Log**

Date	Section	Revision
June 10, 2020	All	Sabina Version
April, 2025	Entire Document (Major Scope)	<ul style="list-style-type: none"> <li>Changed authorship from Sabina Gold &amp; Silver Corp. (Sabina) to B2Gold Back River Corp. (B2Gold Nunavut)</li> <li>Formally designated as Version 1.0, dated April 2025.</li> <li>Restricted version to exploration activities; mine-related activities are now addressed in a separate Mining Spill Contingency Plan.</li> <li>Expanded legal section with Table 1-1, including the Arctic Waters Pollution Prevention Act and National Fire Code 2020.</li> <li>Updated status of George Camp as a 60-person camp and noted Goose Camp's adjacency to the new Goose Mine.</li> <li>Updated contact personnel (project emergency contacts, key site emergency contacts).</li> <li>Replaced former pdf internal spill report form with Site Docs (digitized) for internal tracking.</li> <li>Added table A-5, dedicated to wildlife-specific contacts (CWS, Focus Wildlife) and oiled wildlife response).</li> </ul>
	Title Page & Headers	<ul style="list-style-type: none"> <li>Revised title to explicitly reflect the plan's focus on exploration activities, separating it from broader site mining operations.</li> <li>Updated entire document to B2Gold Nunavut template/format.</li> </ul>
	Front Matter / Summaries	<ul style="list-style-type: none"> <li>Added formal translated Executive Summaries in Inuinnaqtun (Atannguyanin Naittuq) and French (Résumé) to the front matter.</li> </ul>
	Table of Contents / Glossaries	<ul style="list-style-type: none"> <li>Added a dedicated "Acronyms and Abbreviations" section to standardize technical, corporate, and regulatory terms (e.g., SDS, SOPEP, MLA).</li> </ul>
	Section 1.1	<ul style="list-style-type: none"> <li>The background section was revised to make it more concise. The tenure context and properties were updated.</li> </ul>
	Section 1.2	<ul style="list-style-type: none"> <li>The purpose of the Plan was revised to make it more concise to the tasks to be conducted under this Plan.</li> </ul>

	Section 1.3	<ul style="list-style-type: none"> <li>Section was revamped and focused on listing the legislation, regulations and guidelines related to spill contingency planning and response in Canada and in Nunavut that B2Gold will comply with while the previous version was too general with no focus on the legislation. The former Social and Environmental Policy was moved to Section 1.4 in the revised version of the Plan (See next Section).</li> </ul>
	Section 1.4	<ul style="list-style-type: none"> <li>No significant changes. There was a shift in the section numbering. This section focused on policy related to initiation of cleanup activities in the previous version. while the revised version focused on B2Gold Social and Environmental Policy.</li> </ul>
	Section 1.5	<ul style="list-style-type: none"> <li>This section previously focused on risk management while the revised version focused on cleanup initiation policy. No significant changes, but only a shift in the renumbering.</li> </ul>
	Section 1.6	<ul style="list-style-type: none"> <li>There was a shift in the renumbering. Risk Management was moved to Section 1.6. No significant changes in the content.</li> </ul>
	Section 1.7	<ul style="list-style-type: none"> <li>Shifted Existing Facilities overview to Section 1.7 and facilities were updated to include George exploration Camp. No significant changes in the content.</li> </ul>
	Section 2.1	<ul style="list-style-type: none"> <li>Sections were updated to reflect current conditions and site infrastructure, including thirteen 75,000L double walled tanks and one 40,000L bladder to support exploration activities. Additional Back River Project mine fuel storage facilities are present at both Goose and MLA properties. Spills from these facilities or related to Back River Project's bulk fuel transfer activities are addressed in a separate plan "B2Gold Nunavut's Spill Contingency Plan and OPEP &amp; OPEP, respectively.</li> <li>Updated text to indicate all drums are located at least 31 m above the high-water mark of any waterbody.</li> <li>Updated references to current water licenses (2BE-GOO2028).</li> </ul>
	Section 2.2	<ul style="list-style-type: none"> <li>This section was updated to reflect that domestic greywater is released to the environment at least 31 m away from the closest waterbody. This section was also updated to reflect that water collected in berms is treated and tested before being discharged in accordance with applicable requirements in 2BE-GOO2028 and 2BE-GEO2035.</li> <li>The updated version references that testing and discharge criteria will be complied with as per current Type B Water Licenses (2BE-GOO2028 and 2BE-GEO2035).</li> </ul>
	Section 2.3	<ul style="list-style-type: none"> <li>This section was updated to also include that solid waste may be disposed of in a landfill at the Back River Project's mine landfill (as per B2Gold Nunavut's Landfill and Waste Management Plan). No other significant changes were made.</li> </ul>
	Section 2.4	<ul style="list-style-type: none"> <li>This section was updated to modernize references from MSDS to SDS to align with current WHMIS regulatory standards.</li> <li>Clarified that waste oil is burned to generate heat for infrastructure such as the warehouse, maintenance and core logging facilities, or to fuel the incinerator at the Goose Property.</li> <li>Removed obsolete statements such as 'for development works no additional management of hazardous waste is required...' Legacy references were also removed.</li> </ul>
	Section 2.5	<ul style="list-style-type: none"> <li>Updated legacy Type B Water License numbers with current and active numbers. No other significant changes were made.</li> </ul>
	Section 3.1	<ul style="list-style-type: none"> <li>This section was updated, but retained identical, standard field commands regarding first responders. The text was slightly changed from uppercase styling to mixed standard capitalization.</li> </ul>
	Section 3.2	<ul style="list-style-type: none"> <li>Minor change – kept the exact same tactical mandate for the on-site team but aligned formatting with updated B2Gold corporate layout and fonts. Minor changes were made to the content including grammar/spelling and punctuation.</li> </ul>
	Section 3.3	<ul style="list-style-type: none"> <li>This section updated position responsibilities to integrate with new technological workflows. The main difference was that text instructions were updated to reflect the change from manual spreadsheet or PDF logs to using an internal digital platform (e.g., Site Docs) for internal spill tracking/reporting.</li> </ul>
	Section 3.4	<ul style="list-style-type: none"> <li>The title was completely changed to "Environmental Superintendent"</li> <li>Complete deletion of 'Manager Logistics and Technical Services'. This section involved indicating that responsibilities for notifying corporate shifted away from logistics and onto the Environmental team.</li> <li>The title "Coordinator" was removed, and the 2025 text consolidated all accountability under the Environmental Superintendent including providing technical advice on containment, managing lab sample verifications for contaminated soil, and overseeing long-term regulatory compliance filing for Type B Water Licenses (2BE-GEO2035, 2BE-GOO2028, and 2BE-MLL2328).</li> </ul>
	Section 3.5	<ul style="list-style-type: none"> <li>Updated section 3.5 to reflect "Health &amp; Safety Superintendent" which replaced the former section 3.6 (in the 2020 version). There was a structural renumbering caused by deleting the offsite Logistics Manager role. The primary focus is now on safety inspections and providing PPE to cleanup crews.</li> </ul>

	Section 3.6 & 3.7	<ul style="list-style-type: none"> <li>Roles that were not associated with the activities undertaken such as “VP Project Development and VP Sustainability” were removed. High level corporate positions were moved out of the operational field component of Section 3; corporate contact information is now handled in the updated Appendix A (Spill Response Contacts).</li> </ul>
	Section 4.1.1	<ul style="list-style-type: none"> <li>References to MSDS have been replaced with SDS to align with current WHMIS standards.</li> </ul>
	Section 4.1.2	<ul style="list-style-type: none"> <li>No significant changes (other than grammar and punctuation).</li> </ul>
	Section 4.1.3	<ul style="list-style-type: none"> <li>No significant changes (other than grammar and punctuation).</li> </ul>
	Section 4.1.4	<ul style="list-style-type: none"> <li>Community Support was removed to shift the focus of Section 4.0 onto internal on-site personnel and active field operators. No significant other changes were made.</li> </ul>
	Section 4.2	<ul style="list-style-type: none"> <li>Removed the previous rigid and prescriptive timeline regarding field management/spill drills, to a more flexible and continuous readiness standard. Deleted the “twice annually, approximately 6 months apart” and replaced with “routinely conducted”.</li> <li>Updated the text regarding record keeping into a more condensed form indicating that records of training and testing are kept on file and posted to provide access.</li> </ul>
	Section 5.2	<ul style="list-style-type: none"> <li>Updated layout of the table for spill kits.</li> <li>Reference to the legacy Section 5.3 “Mobile Response Unit” was removed.</li> </ul>
	Sections 6.1 – 6.5	<ul style="list-style-type: none"> <li>Restructured steps: 6.1 Identify &amp; Assess, 6.2 Stop Flow, 6.3 Notify Supervisor, 6.4 Spill Containment, 6.5 Recovery &amp; Cleanup.</li> <li>Modernized and updated the text to reflect exploration activities that are separate from mine operations.</li> </ul>
	Section 6.7.4	<ul style="list-style-type: none"> <li>Expanded section to incorporate explicit tactical field procedures for: 6.7.4.1 Spills of Dry Product, 6.7.4.2 Brine Spills, 6.7.4.3 Spills of Cuttings, and 6.7.4.4 Artesian Flow.</li> </ul>
	Section 7.2	<ul style="list-style-type: none"> <li>Table names changed to Table 2 “Summary of Potential Incidents * Preventative Measures along Transportation Corridors”.</li> </ul>
	Section 8	<ul style="list-style-type: none"> <li>Modernized terminology from MSDS to Safety Data Sheets (SDS). Formalized the utilization of the internal digital SiteDocs application platform for compiling and routing internal spill report records.</li> </ul>
	Appendices	<ul style="list-style-type: none"> <li>Reorganized and updated the appendices to focus on contact information routing and corporate identity forms. Moved manual procedural flowcharts into the body of Chapter 6.</li> </ul>