

April 5, 2019

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

**Re: February 2019 Monthly Monitoring Report for Water Licence 2AM-BRP1831**

Dear Richard,

This report is provided by Sabina Gold and Silver Corp. (Sabina) to address the requirements of Part I, Item 18 of the Back River Project (the Project) Type A water licence 2AM-BRP1831 (the Licence).

These requirements include:

- All data and information required by Part I and Tables of Schedule I;
- An assessment of data to identify areas of non-compliance with regulated discharge parameters referred to in this Licence; and
- Documentation of conditions during spring freshet, major rain events, and periods of sustained precipitation including flow measurements, photographs, and notes.

Clauses under Part I of the Licence specifically applicable to monthly monitoring include Items 4, 8, 9, 12, and 20. These items are addressed individually below as are the tables of Schedule I. It is noted that, at this time, activities have not yet commenced under this Licence with the exception of winter ice road construction which was initiated in January of 2019.

**Part I, Item 4 Monitoring Program as outlined in Schedule I Tables 1 and 2**

An overview of monitoring activity by station is provided in Table 1 located at the end of this report. The majority of the sampling required under Schedule I Table 2 of the Licence was not applicable this month due to frozen winter conditions combined with the fact that activities under this licence have not yet been initiated, with the exception of winter ice road construction.

**Part I, Item 8 Monthly Volumes of Water Used and Discharge of Greywater, Sewage Sludge, Effluent and Contact Water**

In February of 2019, 11,640 m<sup>3</sup> of water was withdrawn for winter road construction from lakes proximal to the road. Water withdrawal was monitored daily and monthly usage by lake is provided in Table 2. No exceedance of lake-specific withdrawal limits or total ice road water usage allowance occurred. No other water was used or wastes were discharged under this Licence in February of 2019.



Marine Laydown Area (MLA) camp water use and greywater and sewage sludge disposal occurred under, and in accordance with, water licence 2BE-GEO1520 in February of 2019.

**Part I, Item 9 Monthly Quantity of Landfill, Landfarm, Waste Rock, Tailings Deposited and Ore Stockpiled and Processed**

The landfill, landfarm, waste rock piles, tailings storage area have not been constructed at this time, and no ore has been mined under this Licence.

**Part I, Item 12 Monitoring During Discharge at BRP-15, 16, 43-45, 49, or 51**

Due to frozen winter conditions and the fact that many of these facilities have not yet been constructed, no water was discharged from these stations this month. See details for each station in Table 1 of this report.

**Part I, Item 18 Assessment of Discharge Compliance and Documentation During Freshet and Major/Sustained Rain Events**

No water was discharged under this Licence this month. Freshet and rainfall-related monitoring conditions were not applicable this month due to frozen winter conditions. Other aspects of Part I Item 18, namely the requirement to report monthly, are addressed by this report as a whole.

**Part I, Item 20 Additional Monitoring Imposed by Inspector**

No additional monitoring has been requested by the Inspector at this time.

Should you require any additional information please feel free to contact me.

Regards,

Merle Keefe  
Manager, Environmental Permitting  
Sabina Gold & Silver Corp.  
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Vancouver, BC V7X 1M9

