



Application for Water Licence Amendment

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NUNAVUT WATER BOARD
OFFICE DES EAUX DU NUNAVUT



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APPLICATION FOR WATER LICENCE AMENDMENT

The applicant is referred to the NWB's Guide 7: *Licensee Requirements Following the Issuance of a Water Licence* for more information about this application form.

Where possible, provide background information regarding the original licence application or attach previously submitted information.

EXISTING LICENCE NO: <u>2AM-BRP1831</u>	
1. LICENSEE CONTACT INFORMATION	
Is the licensee the same as that referred to on the existing licence?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If No, a licence assignment must be completed and approved by the NWB. An amendment will only be issued in the name of the current licensee in the absence of assignment of the licence.	
If the licensee is the same, but the <u>name</u> of the licensee has changed, attach a certificate of name change.	
Name: Sabina Gold & Silver Corp. (Corporate Head Office)	
Address: # 1800 - 555 Burrard Street, Box 220, Vancouver, BC Canada, V7X 1M7	
Phone: (604) 998-4175 and Toll Free: (888) 648-4218	
Fax: (604) 998-4175	
e-mail: n/a	
2. LICENSEE REPRESENTATIVE CONTACT INFORMATION – If different from Block 1.	
Name: Mathew Pickard, Vice President, Environment & Sustainability, Sabina Gold & Silver Corp.	
Address: Same as Block 1	

Phone: (604) 484-8967/ (416) 848-1184 and Cell: (416) 605-7881
Fax: (604) 998-1051
e-mail: mpickard@sabinagoldsilver.com

3. NAME OF PROJECT

Has the name of the project changed?

☐ Yes ☒ No

If Yes, indicate the name of the project including the name of the location:

4. LOCATION OF UNDERTAKING

Does the proposed amendment change the location of the amended undertaking?

☐ Yes ☒ No

Provide the project extents and camp locations. Identify proposed changes.

Project Extents/Camp Location(s): Remains unchanged from the current approved water licence.

Project Extents	Latitude	Longitude
Back River Project Area	66° 42' N	107° 50' W
	66° 42' N	106° 11' W
	65° 29' N	106° 12' W
	65° 29' N	107° 50' W
Goose Main Camp Site	66° 38' 47.8'' N	107° 41' 19.4'' W
Marine Laydown Area Camp Site	65° 32' 27.4'' N	106° 30' 28.3'' W

5. MAP

Does the proposed amendment change the locations of any of the main components of the undertaking?

☐ Yes ☒ No

Attach a topographical map, indicating the main components of the undertaking. Identify proposed changes.

NTS Map Sheet No.: **See below** Map Name: **See below** Map Scale: **See below**

NTS Map Sheet No: **76G (Beechey Lake) and 76J (Tinney Hills)**
Scale **1:250,000**

Refer to 2020 Modification Package Appendix A

6. NATURE OF INTEREST IN THE LAND

Does the proposed amendment change the nature of the interest in the land?

☐ Yes ☒ No

If Yes, indicate changes.

Check any of the following that are applicable to the proposed undertaking (at least one box under the 'Surface' header must be checked).

Sabina has not identified any necessary changes to existing Project Certificate (NIRB PC No. 007) Terms and Conditions or to the KIA Framework Agreement/Commercial Leases related to this Modification Package.

Sub-surface

☐ Mineral Lease from Nunavut Tunngavik Incorporated (NTI)

Date (expected date) of issuance: _____ Date of expiry: _____

☒ Mineral Lease from Indian and Northern Affairs Canada (INAC)

Date (expected date) of issuance: _____ Date of expiry: _____

Surface

☒ Crown Land Use Authorization from Indian and Northern Affairs Canada (INAC)

Date (expected date) of issuance: **June 2015** Date of expiry: **June 2039**

☒ Inuit Owned Land (IOL) Authorization from Kitikmeot Inuit Association (KIA)

Date (expected date) of issuance: **June 2015** Date of expiry: **June 2039**

☐ IOL Authorization from Kivalliq Inuit Association (KivIA)

Date (expected date) of issuance: _____ Date of expiry: _____

☐ IOL Authorization from Qikiqtani Inuit Association (QIA)

Date (expected date) of issuance: _____ Date of expiry: _____

☐ Commissioner's Land Use Authorization

Date (expected date) of issuance: _____ Date of expiry: _____

☐ Other

Date (expected date) of issuance: _____ Date of expiry: _____

Is the name of the entity(s) holding authorizations the same as that considered in the existing water licence?

☒ Yes ☐ No

If No, a licence assignment must be completed and approved by the NWB.

Name of entity(s) holding authorizations: **Sabina Gold & Silver Corp.**

7. NUNAVUT PLANNING COMMISSION (NPC) DETERMINATION

Indicate the land use planning area in which the existing project is located.

- ☐ North Baffin
☐ South Baffin
☐ Akunnig

- ☐ Keewatin
☐ Sanikiluaq
☒ West Kitikmeot

Does the proposed amendment change the land use planning area?

☐ Yes ☒ No

If yes, indicate the land use planning area in which the amended undertaking is located.

- ☐ North Baffin
☐ South Baffin
☐ Akunnig

- ☐ Keewatin
☐ Sanikiluaq
☒ West Kitikmeot

Was a land use plan conformity determination required from NPC prior to the issuance of the existing water licence?

☒ Yes ☐ No

If Yes, indicate date issued and attach copy. _____

Does the proposed amendment change the original NPC conformity determination or the need to obtain one?

☐ Yes ☒ No

If Yes, indicate date issued (or expected) and attach a copy.

If No, provide written confirmation from NPC confirming that a land use plan conformity review is not required.

In accordance with NuPPAA, the application for modification was filed with NPC for determination/confirmation timelines consistent with NuPPAA. NPC confirmed that the application for modification remained outside the area of an applicable regional land use plan on 9 June 2020.

8. NUNAVUT IMPACT REVIEW BOARD (NIRB) DETERMINATION

Was a screening determination required from NIRB prior to the issuance of the existing water licence?

☒ Yes ☐ No

If Yes, indicate date issued and attach copy.

Minister AANDC (now CIRNAC) Decision on screening received NIRB December 17, 2012, File 12MN036 available upon request - Copy is on file with NIRB public registry for the Project NIRB Final Hearing Report (July 18, 2017). Project Certificate No. 007 issued: December 19, 2017.

Does the proposed amendment change the original NIRB screening determination or the need to obtain one?

☐ Yes ☒ No

If Yes, indicate date issued (or expected) and attach a copy.

If No, provide written confirmation from NIRB confirming that a screening determination is not required.

As per NIRB's letter, Nunavut Impact Review Board Direction Regarding the "Back River Project 2020 Modification Package" submitted by Sabina Gold & Silver Corp. in relation to the Back River Project" (K. Kaluraq to M. Pickard, dated August 11, 2020, NIRB File No. 12MN036,), the NIRB has decided that the Back River Project 2020 Modification Package would not constitute a significant modification that requires further assessment by the NIRB.

9. DESCRIPTION OF UNDERTAKING

Does the proposed amendment change the description of the undertaking?

☒ Yes ☐ No

List and attach plans and drawings or project proposal. Identify proposed changes.

Refer to Attachment 2 – 2020 Modification Package, Section 1.1

Scope of Activities List:

- Goose Property Airstrip Extension
- Umwelt Underground Extension
- Goose Property Total Water Use Increase
- Waste and Water Management Infrastructure
- Marine Laydown Area (MLA) Fuel Transfer
- MLA Airstrip Extension
- MLA Shoreline Pad Extension
- Winter Ice Road (WIR) Subbase Upgrade
- WIR Service/Emergency Camps
- WIR Total Water Use Increase

Sabina clarifies that mining areas and associated infrastructure already included in the Project Certificate (PC No. 007; NIRB File No. 12MN036) and the Type A Water Licence (2AM BRP1831) will remain in the amended licence. Sabina confirms that the scope of activities in Part A, Item 1 of licence, 2AM-BRP1831, remains unchanged, that Sabina is not requesting a reduction in Project scope, and that the new scope of activities associated with the 2020 Modification Package will be added to the licence as part of this amendment application.

10. OPTIONS

Does the proposed amendment change any of the alternative methods and locations that were considered to carry out the project?

☐ Yes ☒ No

Provide a brief explanation of the alternative methods or locations that were considered to carry out the project. Identify proposed changes.

11. CLASSIFICATION OF PRIMARY UNDERTAKING

Indicate the primary classification of undertaking for the existing licence by checking one of the following boxes:

- | | |
|--|---------------------------------------|
| <input type="checkbox"/> Industrial | <input type="checkbox"/> Agricultural |
| <input checked="" type="checkbox"/> Mining and Milling (includes exploration/drilling/exploration camps) | |
| <input type="checkbox"/> Conservation | |
| <input type="checkbox"/> Municipal (includes camps/lodges) | <input type="checkbox"/> Recreational |
| <input type="checkbox"/> Power | |
| <input type="checkbox"/> Miscellaneous (describe below): | |

Does the proposed amendment change the classification of primary undertaking?

☐ Yes ☒ No

If Yes, indicate the primary undertaking of the amendment: _____

Information in accordance with applicable Supplemental Information Guidelines (SIG) must be updated and submitted with an Application for Amendment. Indicate which SIG(s) are applicable to your application.

- ☐ Hydrostatic Testing
- ☐ Tannery
- ☐ Tourist / Remote Camp
- ☐ Landfarm & On-Site Storage of Hydrocarbon Contaminated Soil
- ☐ Onshore Oil and Gas Exploration Drilling
- ☐ Mineral Exploration / Remote Camp
- ☐ Advanced Exploration
- ☐ Mine Development
- ☐ Municipal
- ☐ General Water Works
- ☐ Power

As per email from S. Kuflevskiy (Technical Advisor, NWB) to M. Keefe (Sabina) dated May 19, 2020, the scope of changes is limited and in line with the previous SIG and therefore there is no need to provide a new SIG.

12. WATER USE

Indicate, using the boxes below, the types of water use(s) approved in the existing licence.

- | | |
|--|--|
| <input checked="" type="checkbox"/> To obtain water for camp/ municipal purposes | <input checked="" type="checkbox"/> To divert a watercourse |
| <input checked="" type="checkbox"/> To obtain water for industrial purposes | <input checked="" type="checkbox"/> To modify the bed or bank of a watercourse |
| <input checked="" type="checkbox"/> To cross a watercourse | |
| <input checked="" type="checkbox"/> To alter the flow of, or store water | <input checked="" type="checkbox"/> Flood control |
| <input checked="" type="checkbox"/> Other: quarry operations, dewatering | |

Does the proposed amendment change the type(s) of water use(s)?

☐ Yes ☒ No

If Yes, indicate using the boxes below, the proposed change(s) to the type(s) of water use(s) noting any water use(s) that are to be added, continued, or removed.

- ☐ To obtain water for camp/ municipal purposes
☐ To obtain water for industrial purposes
☐ To cross a watercourse
☐ To alter the flow of, or store water
☐ Other: _____
- ☐ To divert a watercourse
☐ To modify the bed or bank of a watercourse
☐ Flood control

13. QUANTITY OF WATER INVOLVED

Does the proposed amendment change the source of water? ☐ Yes ☒ No

Indicate the water source(s). Identify proposed changes:

Refer to Table insert below in response to all in this box. Refer to Table 2.3-1 in the Modification Package.

Water Source	FEIS [m ³ /yr]	Type A Water Licence Approved Quantities [m ³ /yr]	Additional Amount Requested [m ³ /yr]	Total Water Use as per Modification Package Type A Water Licence Amendment [m ³ /yr]
Total Water Use: Goose Property and MLA		578,000^a	414,450	992,450
Total Water Use: Goose Property	518,000	468,000	414,450	882,450
Goose Lake	390,000	390,000 ^b	218,700	608,700
Big Lake	128,000	78,000 ^c	195,750	273,750
Total Water Use: MLA		110,000^d	No change	110,000
Total Water Use: Dewatering		1,400,000^e	No change	1,400,000
Total Water Use: Winter Ice Road		675 m³/km^f	1,350 m³/km	2025 m³/km

^a Total Use for domestic, construction operation and associated use including mining and milling as per Type A Water Licence 2AM-BRP1831, Part E, Item 3.

^b As per Type A Water Licence 2AM-BRP1831, Part E, Item 3a.

^c As per Type A Water Licence 2AM-BRP1831, Part E, Item 3b.

^d As per Type A Water Licence 2AM-BRP1831, Part E, Item 3c.

^e As per Type A Water Licence 2AM-BRP1831, Part E, Item 4.

^f As per Type A Water Licence 2AM-BRP1831, Part E, Item 5.

(show location(s) on map) **Refer to Appendix A of the Modification Package**

Does the proposed amendment change the quality of the water source and/or its available capacity?

☐ Yes ☒ No

Describe the quality of the water source(s) and the available capacity(s). Identify any changes: _____

Does the proposed amendment change the overall quantity of water to be used?

☒ Yes ☐ No

Provide the overall estimated quantity to be used. Identify proposed changes:
Refer to Table above

Does the proposed amendment change the quantity of water to be used from each source?

☒ Yes ☐ No

Provide the estimated quantity(s) of water to be used from each source. Identify proposed changes: **Refer to Table above**

Does the proposed amendment change the quantity of water to be used for each purpose?

☒ Yes ☐ No

Provide the estimated quantities to be used for each purpose (camp, drilling, etc.). Identify proposed changes: **Refer to Table above**

Does the proposed amendment change the method(s) of extraction?

☐ Yes ☒ No

Describe the method(s) of extraction. Identify proposed changes:

Does the proposed amendment change the quantity(s) of water returned to source(s)?

☐ Yes ☒ No

Estimated quantity(s) of water returned to source(s). Identify proposed changes: m³/day

Does the proposed amendment change the quality(s) of water returned to source(s)?

☐ Yes ☒ No

Describe the quality(s) of water(s) returned to source(s). Identify any changes:

14. WASTE

Check the appropriate box(s) to indicate the types of waste(s) approved in the existing licence.

- | | |
|---|--|
| <input checked="" type="checkbox"/> Sewage | <input checked="" type="checkbox"/> Waste oil |
| <input checked="" type="checkbox"/> Solid Waste | <input checked="" type="checkbox"/> Greywater |
| <input checked="" type="checkbox"/> Hazardous | <input checked="" type="checkbox"/> Sludges |
| <input checked="" type="checkbox"/> Bulky Items/Scrap Metal | <input checked="" type="checkbox"/> Contaminated soil and/or water |
| <input type="checkbox"/> Animal Waste | |
| <input checked="" type="checkbox"/> Other (describe): _mine waste (i.e., overburden, waste rock, tailings) | |

Does the proposed amendment change the type(s) of waste(s) to be generated or deposited?

☐ Yes ☒ No

If Yes, indicate using the boxes below, the proposed change(s) to the type(s) of waste(s) to be generated and/or deposited noting the addition, removal or continued generation and/or disposal of waste(s).

<input type="checkbox"/> Sewage <input type="checkbox"/> Solid Waste <input type="checkbox"/> Hazardous <input type="checkbox"/> Bulky Items/Scrap Metal <input type="checkbox"/> Animal Waste <input type="checkbox"/> Other (describe): _____	<input type="checkbox"/> Waste oil <input type="checkbox"/> Greywater <input type="checkbox"/> Sludges <input type="checkbox"/> Contaminated soil and/or water
--	---

15. QUANTITY AND QUALITY OF WASTE INVOLVED

Does the proposed amendment change the quantity(s) of the types of wastes involved?

☒ Yes ☐ No

Does the proposed amendment change the composition(s) of the types of wastes involved?

☐ Yes ☒ No

Does the proposed amendment change the method(s) of treatment for the types of waste involved?

☐ Yes ☒ No

Does the proposed amendment change the method(s) of disposal for the types of waste involved?

☐ Yes ☒ No

If Yes to any of the above, describe the proposed changes: **Refer to Table below for change in quantities.**

For each type of waste indicated in Block 14, describe its composition, quantity in cubic meters/day, method of treatment and method of disposal.

Note: the only values to change as a result of the amendment request (comparative to the original application are shown below):

Type of Waste	Composition	Approved Type A Water Licence Values	Quantity Generated	Treatment Method	Disposal Method
Tailings	Non-Acid Generating (NAP) and low potential for metal leaching in the long term (Refer to SD-09)	19.8 Mt	12.4 Mt	None	Tailings Storage Facility (TSF) and Tailings Facility (TF)*
Waste Rock	No potential acid generating (NPAG) and low potential for metal leaching (Refer to SD-08)	59 Mt	86.6 Mt	None	Waste Rock Storage Areas (WRSAs)
Overburden	NPAG, Low potential for metal leaching and will meet MDMER monthly mean limits (Refer to SD-08)	5.3	6.5 Mt	None	Temporary storage in overburden stockpile; closure and site reclamation; co-disposed within WRSAs

*TFs in the original licence included TFs in Umwelt and Goose Main open pits; Sabina is requesting the TF definition be expanded to include Llama and Echo open pits as part of this amendment application.

Note: Original application for current Type A Licence can be found at: ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-BRP1831%20Sabina/1%20APPLICATION/2017/171005%202AM-BRP---CoverLtr_ApplicationForm-IMLE.pdf

16. OTHER AUTHORIZATIONS

Does the proposed amendment change the need for other authorizations in addition to the sub-surface and surface land use authorizations provided in Block 6?

☐ Yes ☒ No

If Yes, indicate any additional authorizations required, which authorizations are no longer required, and which authorizations continue to be required.

For each provide the following: **Refer to summary below**

Authorization: _____

Administering Agency: _____

Project Activity: _____

Date (expected date) of issuance: _____ Date of expiry: _____

Sabina has not identified any necessary changes to existing Project Certificate (NIRB PC No. 007) Terms and Conditions as per NIRB's letter, *Nunavut Impact Review Board Direction Regarding the "Back River Project 2020 Modification Package" submitted by Sabina Gold & Silver Corp. in relation to the Back River Project* (K. Kaluraq to M. Pickard, dated August 11, 2020, NIRB File No. 12MN036,), the NIRB has decided that the Back River Project 2020 Modification Package would not constitute a significant modification that requires further assessment by the NIRB.

Sabina has also not identified any necessary changes to the existing KIA Framework Agreement/Commercial Leases related to this Modification Package.

Amendments to Type A Water Licence (2AM-BRP1831) are anticipated as being necessary to increase water use allowance and in consideration of potential changes associated with the Project Interim Closure and Reclamation Plan are appropriately addressed. Sabina will follow all appropriate NWB processes associated with this amendment, and will work cooperatively with KIA, CIRNAC, and NWB on any related Project security revisions.

Sabina anticipates, and has confirmed with the DFO, that an update is necessary to the existing DFO Letter of Advice (18-HCAA-00971) to reflect planned in-water works related to the MLA Shoreline Pad Extension. Sabina will also prepare an application addressed to TC to ensure any in-water works will not substantially interfere with navigation, as is required under the *Navigation Protection Act*.

Sabina will review the Back River Project Marine Environment Land Lease (CIRNAC #76J/12-7-2), and the Winter Ice Road Land Use Licence (CIRNAC #N2018F0017), for

possible revisions as a result of the Modification Package and adhere to any applicable processes.

Where additional regulatory processes may be required for individual Project modifications, Sabina will work cooperatively with all interested parties to ensure appropriate compliance.

17. PREDICTED ENVIRONMENTAL IMPACTS OF UNDERTAKING AND PROPOSED MITIGATION MEASURES

Does the proposed amendment change the predicted environmental impacts of the undertaking or the mitigation measures?

☐ Yes ☒ No

Describe direct, indirect, and cumulative impacts related to water and waste. Identify any changes.

For detailed assessment of environmental impacts refer to Modification Package summary tables:

- **Table 1.5-1 2020 Modification Package Effects Assessment**
- **Table 1.6-1 Summary of Cumulative Project-related Residual Effects and Significance**

Results from the Modification Package effects assessment identified minimal change to the FEIS residual effects, and no change to the overall significance ratings for the FEIS residual effects. As a result, Sabina confirms that the overall effect of the Project on the atmospheric, terrestrial, freshwater, marine, and human environments remains the same as the FEIS effects assessment: Not Significant.

As per NIRB's letter, *Nunavut Impact Review Board Direction Regarding the "Back River Project 2020 Modification Package" submitted by Sabina Gold & Silver Corp. in relation to the Back River Project* (K. Kaluraq to M. Pickard, dated August 11, 2020, NIRB File No. 12MN036,), the NIRB has determined that the Back River Project 2020 Modification Package would not constitute a significant modification that requires further assessment by the NIRB.

18. WATER RIGHTS OF EXISTING AND OTHER WATER USERS

Was compensation paid and/or an agreement(s) for compensation been entered into with any existing or other users of water during consideration of the existing licence?

☐ Yes ☒ No

If Yes, provide the names, addresses and the nature of water use by those persons or properties.

Does the proposed amendment adversely affect any known persons or property including those that hold licences for water use in precedence to the application, domestic users, in-stream users, authorized waste depositors, owners of property, occupiers of property, and/or holders of outfitting concessions, registered trapline holders, and holders of other rights of a similar nature?

☐ Yes ☒ No

If Yes, provide the names, addresses and the nature of water use of those persons or properties.

Advise the Board if compensation has been paid and/or an agreement(s) for compensation has been reached with any existing or other water users with respect to the proposed amendment.

19. INUIT WATER RIGHTS

Was compensation paid/ or an agreement(s) for compensation been entered into with any Designated Inuit Organization (DIO) during consideration of the existing licence?

☒ Yes ☐ No

If Yes, which DIO(s) Kitikmeot Inuit Association

Does the proposed amendment substantially affect the quality, quantity or flow of waters flowing through Inuit Owned Land (IOL)?

☐ Yes ☒ No

If Yes, advise the Board if negotiations have commenced or an agreement to pay compensation for any loss or damage has been reached with one or more DIO(s) with respect to the proposed amendment.

Sabina has not identified any necessary changes to the KIA Framework Agreement/Commercial Leases related to this Modification Package.

20. CONSULTATION - Provide a summary of any consultation meetings including when the meetings were held, where and with whom. Include a list of concerns expressed and measures to address concerns.

Refer to Modification Package Section 1.4 for additional detail.

Sabina has engaged communities specifically regarding the Modification Package Application. Details of the proposed modifications in the Modification Package were presented during public meetings (September 2019) in Cambridge Bay and Kugluktuk, and at the KIA Annual Board Meeting in Kugaaruk. In addition, Sabina discussed its need to complete detailed engineering and further refinement of the Project's execution plan during public meetings held in each Kitikmeot Region community in May 2019: Cambridge Bay, Gjoa Haven, Kugaaruk, Kugluktuk, and Taloyoak.

Community engagement summaries for each proposed modification are included within each specific section of the Modification Package. These summaries include information from both of Sabina's Community Engagement Databases: FEIS (2012-2017) and post-FEIS (2018+); in addition, these summaries include details from community concerns, comments, and recommendations documented in Appendix III of KIA (2014).

21. SECURITY INFORMATION

Does the proposed amendment change the financial security assessment?

☒ Yes ☐ No

Does the proposed amendment change the estimate of the total financial security for final reclamation?

☒ Yes ☐ No

Provide an estimate of the total financial security for final reclamation equal to the total outstanding reclamation liability for land and water combined sufficient to cover the highest liability over the life of the undertaking. Estimates of reclamation costs must be based on the cost of having the necessary reclamation work done by a third party contractor if the operator defaults. The estimate must also include contingency factors appropriate to the particular work to be undertaken. Identify any changes in the financial security assessment resulting from the proposed amendment.

Where applicable, the financial security assessment should be prepared in a manner consistent with the principals respecting mine site reclamation and implementation found in the *Mine Site Reclamation Policy for Nunavut*, Indian and Northern Affairs Canada, 2002.

Sabina anticipates that an amendment to the Type A Water Licence (2AM-BRP1831) may be required to update the approved Interim Closure and Reclamation Plan and cost estimate (ICRP; 2AM-BRP1831 Part B, Item 14g) to reflect changes associated with the 2020 Modification Package, as well as potential advancements in operation and technology. Sabina recognizes that additional consultation and discussion with KIA and CIRNAC, in conjunction with oversight from NWB, will be required to address any monetary and/or staging changes associated with this application. Sabina will follow all appropriate NWB processes associated with this amendment, and will work in a timely, collaborative manner with KIA, CIRNAC, and NWB on any related Project security revisions in consideration of the 2020 Modification Package. The current monetary amount, staging, and regulatory divisions between KIA and CIRNAC, required in Part C of the Type A Water Licence (2AM-BRP1831), remains valid until a new version can be agreed upon by all parties.

22. FINANCIAL INFORMATION

Is the statement of financial security the same as that considered in the existing water licence?

☒ Yes ☐ No

Provide an updated statement of financial security.

The Project is 100% owned by Sabina. All rights, title, interests, liabilities, and obligations for the Project rest with Sabina. Taking into account Sabina's past performance, Sabina confirms in this Application:

- **they have the financial responsibility adequate to satisfy section 57 of the NWNSRTA, to complete the undertaking from Construction to Closure;**
- **measures are in place and will be put in place to mitigate any adverse impacts; and**
- **they are committed to ongoing maintenance and restoration of the Project in the event of future closing or abandonment of the undertaking. Sabina is confident in assuming its position, taking into account their current, ongoing, and past performance in the Kitikmeot region, Nunavut, and Canada.**

A copy of Sabina's audited financial statements can be found at the following link: [Financial Statements](#).

If the applicant is a business entity please answer the questions below:

Is the list of the officers of the company the same as those considered in the existing water licence?

☒ Yes ☐ No

Provide a list of the officers of the company.

Bruce McLeod, Director, President and Chief Executive Officer

Email: bmcleod@sabinagoldsilver.com

Matthew Pickard, Vice-President, Environment & Sustainability

Email: mpickard@sabinagoldsilver.com

Elaine Bennet, Chief Financial Officer and Vice-President, Finance

Email: ebennett@sabinagoldsilver.com

Angus Campbell, Vice-President, Exploration

Email: acampbell@sabinagoldsilver.com

Nicole Hoeller, Vice-President, Communications

Email: nhoeller@sabinagoldsilver.com

Is the Certificate of Incorporation or evidence of registration of the company name the same?

☒ Yes ☐ No

Attach a copy of the Certificate of Incorporation or evidence of registration of the company name.

To minimize duplication the information (i.e., Certificate of Incorporation and evidence of registration) is posted to the NWB Public Registry Appendix C-1 at the following link:

<ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-BRP1831%20Sabina/1%20APPLICATION/2017/Main%20Application%20Document%20and%20all%20Appendices%20of%20MAD/>

23. STUDIES UNDERTAKEN TO DATE

List and attach updated studies, reports, research etc.

To support the scope of modification requested, Sabina has updated and included in the modification Package:

- Updated Water Management Plan (Appendix B)

To confirm consistency, minor changes may be required to other management plans. As such, Sabina will submit revisions to the plans required by changes in operation and/or technology in the form of Addendum to be included with the Annual Report, consistent with the current Type A Water Licence Part B, Item 17 or as otherwise directed by the Board on approval of the amendment.

Sabina's comprehensive management program and associated management plans for the Project, consistent with the approved Type A Water Licence, includes:

Infrastructure and Access Management Program

- Road Management Plan
- Borrow Pits and Quarry Management Plan

Water Management Program

- Water Management Plan

Waste Management Program

- Ore Storage Management Plan
- Mine Waste Rock Management Plan
- Tailings Management Plan
- Landfill and Waste Management Plan
- Incineration Management Plan
- Landfarm Management Plan
- Hazardous Materials Management Plan

Emergency Response Program

- Risk Management and Emergency Response Plan
- Fuel Management Plan
- Spill Contingency Plan
- Oil Pollution Emergency Plan*

General and Aquatic Effects Monitoring Program

- Environmental Management and Protection Plan
- Aquatic Effects Management Plan
- Conceptual Fish Offsetting Plan*
- Marine Monitoring Plan*
- Quality Assurance / Quality Control Plan

Interim Closure and Reclamation Program

- Interim Closure and Reclamation Plan (including cost estimate and vegetation monitoring plan)

* plan outside the mandate of the NWB but available on NIRB public registry if needed.

Provide a compliance assessment and status report including a response to any inspector's reports. The licensee must contact the NWB for licence specific direction in completing the assessment and report.

A compliance assessment and status report to Type A Water Licence 2AM-BRP1831 is attached to this application form for amendment.

Sabina currently holds one water licences for the Project: Type A Water Licence 2AM-BRP1831. Note: Type B – 2BC-BRP1819 for initial development works expired on issuance of the Type A Water Licence.

A summary of agency inspections and site visits for the 2019 calendar year were reported to include:

1. January 30: CIRNAC Water Licence Inspection
2. May 9: KIA Back River WIR Site Visit
3. May 9: CIRNAC Land Use Inspection
4. July 24: KIA Back River Project Inspection

No inspections were undertaken in 2020 due to Covid19 - Sabina submitted update to all regulators of on-site activities and photographs on September 14, 2020.

If in non-compliance, a licence may not be issued until compliance is achieved. If in non-compliance, attach plans/reports for consideration. Application will not be processed if significant issues of non-compliance exist.

24. PROPOSED TIME SCHEDULE

When are proposed amendments scheduled to be undertaken: Q2/2021

Does the proposed amendment change the time schedule considered in the existing licence for any phase of development?

☒ Yes ☐ No

Indicate the start and completion dates for each applicable phase of development (construction, operation, closure, and post closure). Identify proposed changes.

Construction

Proposed Start Date: Q2/2021 Proposed Completion Date: Q4/2023

Operation

Proposed Start Date: Q1/2024 Proposed Completion Date: Q4/2035

Closure

Proposed Start Date: Q1/2036 Proposed Completion Date: Q4/2043

Post - Closure

Proposed Start Date: Q1/2044 Proposed Completion Date: Q4/2048

For each applicable phase of development indicate which season(s) activities occur.

Anticipated start seasons as follows (in blue)

Construction

☐ Winter ☒ Spring ☐ Summer ☐ Fall ☐ All season

Operation

☒ Winter ☐ Spring ☐ Summer ☐ Fall ☐ All season

Closure

☒ Winter ☐ Spring ☐ Summer ☐ Fall ☐ All season

Post - Closure

☒ Winter ☐ Spring ☐ Summer ☐ Fall ☐ All season

25. PROPOSED TERM OF LICENCE

On what date does the existing licence expire? **December 31, 2031**

Is the Licensee applying for a combined renewal and amendment of the existing licence?

☐ Yes ☒ No

If Yes, indicate the proposed term of the renewal (maximum of 25 years): _____

Requested date of renewal issuance: _____ Requested Expiry Date: _____
(month/year) (month/year)

(The requested date of renewal issuance must be at least three (3) months from the date of application for a type B water licence and at least one (1) year from the date of application for a type A water licence, to allow for processing of the water licence application. These timeframes are approximate and do not account for the time to complete any pre-licensing land use planning or development impact requirements, time for the applicant to prepare and submit a water licence application in accordance with any project specific guidelines issued by the NWB, or the time for the applicant to respond to requests for additional information. See the NWB's *Guide 5: Processing Water Licence Applications* for more information)

26. ANNUAL REPORTING

Will the proposed amendment change the content of annual reports or the annual report template?

☐ Yes ☒ No

If Yes, provide details regarding the content of annual reports and a proposed outline or template of the annual report.

27. CHECKLIST

The following must be included with the application for Amendment for the water licensing process to begin.

Completed Application for Water Licence Amendment form.

☒ Yes ☐ No If no, date expected _____

Information addressing Supplement Information Guideline (SIG), where applicable (see Block 11)

☐ Yes ☒ No If no, date expected **Not Required refer to Block 11**

Compliance Assessment / Status Report (see Block 23).

☒ Yes ☐ No If no, date expected _____

Indication of Renewal Requirement (see Block 26)


☐ Yes ☒ No If no, date expected _____

English Summary of Amendment Application.

☒ Yes ☐ No If no, date expected _____

Inuktitut and/or Inuinnaqtun Summary of Amendment Application.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	If no, date expected _____
Application fee of \$30.00 CDN (Payee Receiver General for Canada).		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	If no, date expected _____
Water Use Fee Deposit of \$30.00 CDN (Payee Receiver General for Canada). The actual water use fee will be calculated by the NWB based upon the amount of water authorized for use in accordance with the Regulations at the time of issuance of the licence.		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	If no, date expected _____
Crown – paid annually in accordance with approved Type A Water Licence.		
KIA – provided with Water Compensation Agreement		

28. SIGNATURE			
Merle Keefe	Manager, Environmental Permitting		9 October 2020
Name (Print)	Title (Print)	Signature	Date