



---

## Sabina's Project Modification Submission to NWB

---

**Merle Keefe** <mkeefe@sabinagoldsilver.com>

Thu, Oct 15, 2020 at 10:51 AM

To: Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>

Cc: Richard Dwyer <richard.dwyer@nwb-oen.ca>, Karén Kharatyan <karen.kharatyan@nwb-oen.ca>

Good Morning Sergey,

My responses to your comments are below in **green**:

### NIRB-2. Water Management Plan

Note: this Plan has been updated and submitted as part of this Application Package (Baseline Study is being under the NWB's review). **Correct**

### NIRB-3. Mine Closure Plan

As stated in your cover letter, Sabina is currently working with the KIA and CIRNAC on updates to the ICRP, which will be submitted prior to technical review. Will the Mine Closure Plan be included into the ICRP or will it be provided as a separate submission? **As per Part J of Sabina's Type A Licence, our "Mine Closure Plan" is at the Interim Closure and Reclamation Plan stage. The ICRP update will be submitted as previously stated.**

### NIRB-4. Oil Pollution Emergency Plan (to reflect updated operational procedures for the fuel transfer station at the MLA).

Please confirm the timeline for the Plan submission. **As per Sabina's response to the NIRB on August 20<sup>th</sup> (see attached), Sabina will provide it directly to the NIRB as part of our 2020 Annual Report.**

### NIRB-6. Quarry Management Plan (to include quarries and borrow pits to be used to supply aggregate for the Winter Ice Road enhancements).

Please confirm the timeline for the Plan submission. **As per Sabina's response to the NIRB on August 20<sup>th</sup> (see attached), Sabina will provide it directly to the NIRB as part of our 2020 Annual Report. However, Sabina will endeavor to provide an updated Quarry MP prior to the technical review.**

I hope this answers your questions! If not, please continue to reach out.

Thanks,  
Merle

---

**From:** Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>

**Sent:** Wednesday, October 14, 2020 2:31 PM

**To:** Merle Keefe <mkeefe@sabinagoldsilver.com>

**Cc:** Richard Dwyer <richard.dwyer@nwb-oen.ca>; Karén Kharatyan <karen.kharatyan@nwb-oen.ca>

**Subject:** Re: Sabina's Project Modification Submission to NWB

[Sender is external to Sabina Gold & Silver]

[Quoted text hidden]

[Quoted text hidden]

----- Forwarded message -----

From: Merle Keefe <mkeefe@sabinagoldsilver.com>

To: Keith Morrison <kmorrison@nirb.ca>

Cc: "info@nirb.ca" <info@nirb.ca>, Matthew Pickard <mpickard@sabinagoldsilver.com>

Bcc:

Date: Thu, 20 Aug 2020 20:37:25 +0000

Subject: RE: NIRB 124149 / 12MN036: Notice Regarding the NIRB's Processing of Sabina's "2020 Modification Package" Project Proposal

Hello Keith,

As requested in the NIRB's Back River Project 2020 Modification Package Board Direction Letter (dated August 11, 2020), Sabina is providing the NIRB with the expected submission timeline for the Management Plans outlined in the Direction Letter, as well as all other currently applicable Construction-related Project Certificate Term and Condition requirements for the Back River Project.

Sabina anticipates the only modification activity outlined in the Modification Package to occur in 2020 will be the Goose Property Airstrip Extension. Sabina intends to provide the required Management Plans specific to this modification prior to the activity commencing in Q4, 2020. As outlined in Section 2.1.4 of the Back River Project Modification Package, these Management Plans include:

1. Air Quality Monitoring and Management Plan
2. Water Management Plan
3. Wildlife Mitigation and Monitoring Plan

In addition, Sabina will submit a revised Road Management Plan in Q4, 2020 and in advance of the Goose Property Airstrip Extension.

Sabina intends to provide the remaining Back River Project Management Plans specified in the NIRB's Direction Letter, as well as all other currently applicable Construction-related Project Certificate Term and Condition requirements, as part of Sabina's Back River Project 2020 Annual Report to the NIRB. To facilitate review and provide transparency, Sabina will also provide a tracking list to the NIRB which details where each Construction-related Project Certificate Term and Condition is addressed within the submitted documents. Sabina anticipates the timelines proposed will allow alignment with the upcoming Back River Project Type A Water Licence amendment process which is anticipated to result in further Management Plan revisions; this will aid in ensuring Management Plans provided to the NIRB reflect the NWB's direction and/or approved versions. If NWB related Management Plans are still in the process, Sabina will provide an updated timeline recognizing the NWB may require further updates to take into account commitments made during the regulatory review of the Amendment Application. Furthermore, Sabina also intends to systematically screen all documents provided for the purpose of generating a comprehensive list of all applicable Project monitoring requirements.

Sabina also acknowledges and confirms the timeline requested by the NIRB to provide responses to Information Requests received from the regulators by September 30th.

Please note, I am in the field from August 22<sup>nd</sup> – September 15<sup>th</sup> and it would be greatly appreciated if you cc Matthew Pickard in any correspondence that follows.

Thanks,

*Merle Keefe, EIT*

**Manager, Environmental Permitting**

**Sabina Gold & Silver Corp.**



Office: (604) 998-4190

Mobile: (604) 240-6619

Email: [mkeefe@sabinagoldsilver.com](mailto:mkeefe@sabinagoldsilver.com)

---

**From:** NIRB Enterprise Management System <[noreply@nirb.ca](mailto:noreply@nirb.ca)>

**Sent:** Tuesday, August 11, 2020 9:54 AM

**To:** [info@nirb.ca](mailto:info@nirb.ca)

**Subject:** NIRB 124149 / 12MN036: Notice Regarding the NIRB's Processing of Sabina's "2020 Modification Package" Project Proposal

[Sender is external to Sabina Gold & Silver]

11-Aug-2020

Dear Parties,

Please see the attached correspondence from the Nunavut Impact Review Board (NIRB or Board) regarding Sabina Gold & Silver Corp.'s (Sabina) "2020 Modification Package" project proposal and reconsideration of the Back River Project Certificate No. 007 (NIRB File No. 12MN036).

All documentation associated with this project proposal is available online from the NIRB's public registry at <http://www.nirb.ca/project/124149>.

Should you have any questions regarding the preceding, please contact Keith Morrison at (867) 983-4617 or via email at [kmorrison@nirb.ca](mailto:kmorrison@nirb.ca).

Best regards,

Cassel Kapolak  
Environmental Administrator

Nunavut Impact Review Board

P.O. Box 1360 (29 Mitik)  
Cambridge Bay, NU X0B 0C0  
Phone: 867-983-4600  
Toll Free: 1-866-233-3033  
Fax: 867-983-2594  
E-mail: [info@nirb.ca](mailto:info@nirb.ca)  
Web: [www.nirb.ca](http://www.nirb.ca)



**RE: NIRB 124149 / 12MN036: Notice Regarding the NIRB's Processing of Sabina's "2020 Modification Package" Project Proposal.eml**  
34K