



NWB Tools

Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca>

Re: Submission Date for the Back River Draft EIS

1 message

Karén Kharatyan <karen.kharatyan@nwb-oen.ca>

Wed, Jan 8, 2014 at 8:41 AM

To: Matthew Pickard <MPickard@sabinagoldsilver.com>

Cc: David Hohnstein <david.hohnstein@nwb-oen.ca>, "Phyllis Beaulieu (phyllis.beaulieu@nwb-oen.ca)" <phyllis.beaulieu@nwb-oen.ca>, "damien.cote@nwb-oen.ca" <damien.cote@nwb-oen.ca>, Max Brownhill <MBrownhill@sabinagoldsilver.com>

Happy New Year Matthew!

Sorry to hear about your weather and other challenges of the end of 2013. I was lucky that i took my vacation and went to Toronto in the beginning December with all these flight cancellations and delays right now.

I agree with you that the project splitting term in this case would be very relative as 2 applications would be of type A which is the highest level of licensing and regulating the undertakings.

However, there are some uncertainties related to the processing of 2 type applications for 1 project. The very first question would be for the Board: are we going to have 2 separate PH processes or not, etc...

As you say it may not be of high risk at this time as those applications would be just drafts with possibilities to merge them later on. However, the NWB may want to discuss it before the submission which could be helpful for you as well.

You will be informed further about the timing of potential call.

Regards,



Karén Kharatyan, Ph. D- ԵՌՊՀ ԲՏՈՒՄ

Technical Advisor- Conseiller technique

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On Wed, Jan 8, 2014 at 6:34 AM, Matthew Pickard <MPickard@sabinagoldsilver.com> wrote:

Karen,

First off Happy New Year. I apologize for the delay in getting back to you. I got caught up the in Toronto ice storm during Christmas and had no power for 7 days then managed to get a serious flu that went around the family. Good times...

Sorry to hear that our plans weren't clear with NWB. That was not my intent so I do apologize. We will be applying for 2 Type A Water Licenses – one to cover mining activities and one to cover transportation corridors including the Marine Laydown Area. At our meeting on October 2nd with NWB we brought up our plan to role the winter road Type B's (which we are going to request) and MLA into a separate Type A. Upon review of our notes and discussion with everyone who participated from our side it's clear that we may not have explained that plan well enough to your side – hence the confusion.

Understand that I don't see two Type A Licenses being of any real benefit to Sabina's permitting or operating plans. We are proposing this to allow for future flexibility for greater direct Inuit involvement or ownership in infrastructure in the North.

Further to this, I'm not sure how it could be considered Project splitting as it's my understanding that a Type A has no maximum threshold for activity. Regulators generally get concerned about Project splitting when a proponent looks to be trying to avoid a more strict review process or additional obligations by splitting there requested work plan into smaller chunks. In this case the Minister has already ruled for a Part 5 review under the NLCA which (other than a part 6) is pretty much the highest level of review. And the Type A is the highest water license available. It is not our intent to avoid any of the public or technical discussions required for an authorization of this magnitude, nor is it our intent to reduce the obligations contained with one or multiple permits.

I'd be happy to have a call with you and other members of the water board early next week if you feel this is a high risk item. Either way the DEIS only contains Draft Type A Water License Applications and I don't believe there is anything really limiting us from merging them prior to the FEIS and Full Type A Water Licence applications in the future in NWB prefers it. We could also merge it prior to the first round of NIRB technical meetings if need be and revise our submission. That being said, it you see it being a major sticking point for the upcoming conformity review (starting the week of January 20th) I want to be sure we do what we can to address it now.

Let me know you thoughts and we will set something up asap. Again, my apologies for the miscommunication. Making bumps in the process is never my objective!

Many thanks, Matthew

From: Karén Kharatyan [mailto:karen.kharatyan@nwb-oen.ca]

Sent: December-20-13 4:42 PM

To: Matthew Pickard

Cc: Amanda Hanson; David Hohnstein; Ryan Barry; Phyllis Beaulieu (phyllis.beaulieu@nwb-oen.ca);

Subject: Re: Submission Date for the Back River Draft EIS

I am quite curious what you meant in your message when speaking about 2 Type A applications

Or it is not for the road construction?

how they would be processed by the Board, separately or under the same Public Hearing process etc.

Karen



Technical Advisor - Conseiller technique
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On Tue, Dec 17, 2013 at 5:33 PM, Matthew Pickard <MPickard@sabinagoldsilver.com> wrote:

Amanda/Dave,

Please find attached a letter detailing out the timelines of the Back River Project Draft EIS Submission. As we are in a NIRB/NWB coordinated process this package will also contain various regulatory applications including two Draft Type A Water Licenses.

If you have any questions please feel free to contact me.

Happy holidays, Matthew

Matthew Pickard B.Sc., MBA, P.Geo, CRSP, EP

Vice President, Environment & Sustainability

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