

NIRB File No.: 12MN036

May 17, 2018

Matthew Pickard Vice President, Environment and Sustainability Sabina Gold and Silver Corporation Suite 375, Two Bentall Centre 555 Burrard Street P.O. Box 220 Vancouver, BC, V7X 1M7

Sent via email: mpickard@sabinagoldsilver.com

Re: Response to Sabina Gold and Silver Corporation's request for Overwintering of Fuel for the Back River Gold Mine Project

Dear Matthew Pickard,

On March 19, 2018 the Nunavut Impact Review Board (NIRB or Board) received correspondence from Sabina Gold and Silver Corporation (Sabina) requesting confirmation that its plans to overwinter fuel barges in 2018/2019 does not constitute a significant modification to the Back River Gold Mine Project (NIRB File No. 12MN036, Project Certificate No. 007).

After completing a review of all information provided, the NIRB is of the understanding that the proposed 2018/2019 plans to overwinter fuel barges does not change the general scope of the original project activities as reviewed by the Board, and no further formal authorizations are required by Sabina in order to proceed. The NIRB encourages Sabina to follow all Transport Canada guidelines and standards related to fuel barges and fuel transfers in the Arctic, including the Guidelines for Over-Wintering of vessels carrying oil or noxious liquid substances in waters under Canadian Jurisdiction (TP15295E). The NIRB also reminds Sabina that all activities associated with the Back River Project remain subject to the terms and conditions in the NIRB Project Certificate No. 007, including terms and conditions 65, 89, 90, and 92 which pertain to marine shipping and accidents and malfunctions, which may be relevant to the overwintering of fuel.

All documents received and pertaining to this project proposal can be obtained from the NIRB's online public registry at www.nirb.ca by using any of the following search criteria:

Project Name: Back River Project

NIRB File No.: 12MN036Application No.: 124149

Should you have any questions or require clarification regarding the basis for the NIRB's determination, please contact the undersigned at (867) 983-4609 or johokannoak@nirb.ca.

Sincerely,

Jaida Ohokannoak Technical Advisor II Nunavut Impact Review Board

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cc: Karén Kharatyan, Nunavut Water Board

Geoff Clark, Kitikmeot Inuit Association

Transport Canada