

NIRB File No.: 12MN036

June 10, 2019

Matthew Pickard, Sabina Gold and Silver Corp. Suite 202-930 West 1st Street, Suite 202 Vancouver, B.C. V7B 3N4

Sent via email: mpickard@sabinagoldsilver.com

Re: Opportunity to Address Comments Received Regarding Sabina Gold and Silver Corporation's Back River Project 2018 Annual Report

Dear Matthew Pickard:

On May 01, 2019 the Nunavut Impact Review Board (NIRB or Board) received Sabina Gold and Silver Corporation's (Sabina) Back River Gold Mine Project 2018 Annual Report as required by the Back River Gold Mine Project Certificate No. 007.

On May 03, 2019 the NIRB requested that interested parties review the 2018 Annual Report and provide comments with respect to their jurisdiction and/or area of expertise on whether the conclusions reached by Sabina in the 2018 Annual Report were valid. Furthermore, parties were requested to comment on the Proponent's compliance status with regard to authorizations that have been issued for the Project Certificates.

On or before June 3, 2019 the NIRB received comments from the following interested parties:

- Kitikmeot Inuit Association (KIA)
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
- Fisheries and Oceans Canada (DFO)
- Transport Canada (TC)

All comment submissions received by the NIRB related to the 2018 Annual Report can be accessed from the NIRB's online public registry at www.nirb.ca/project/124149 by searching the Document ID numbers: 324993, 325258, 325282, and 325295.

The NIRB would like to provide Sabina with an opportunity to address these comments prior to the completion of the NIRB Annual Monitoring Report for the Back River Gold Mine Project, and requests that a response be provided directly to the NIRB by **July 2, 2019**. If Sabina determines that the time required to supply a written response is significantly greater than three (3) weeks, the Board requests written notification as soon as possible with an anticipated date for submission.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the NIRB's online public registry at www.nirb.ca.

If you have any questions or require additional information on the NIRB's monitoring program for the Back River Project, please contact Jaida Ohokannoak, Monitoring Officer, at (867) 983-4609 or via email at johokannoak@nirb.ca.

Sincerely,

Jaida Ohokannoak

Technical Advisor II

Nunavut Impact Review Board

cc: Sabina Distribution List

Chida Oholand

Merle Keefe, Sabina Gold and Silver Corp.