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## Sabina inspection report 2AM-BRP1831

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**Pasalic, Omer** <omer.pasalic@rcaanc-cirnac.gc.ca>

Mon, Nov 29, 2021 at 11:23 AM

To: Merle Keefe <mkeefe@sabinagoldsilver.com>, Matthew Pickard <mpickard@sabinagoldsilver.com>

Cc: licensing <licensing@nwb-oen.ca>

Hi Merle,

Thank you for your detailed response. The report is not meant to be taken as any kind of accusations. That was not the intent. The report is based on my observations while i was on the site. I will be happy to have teleconference with you and Matthew this afternoon and discuss the points you brought forward in your email below. I am having issues with my msteams, perhaps you can contact me at 867-222-2744 to discuss further. If there was a misunderstanding between myself and your representative at the site, I will be happy to prepare supplementary report to the original report.

Thanks,

Omer.

Sent from my Bell Samsung device over Canada's largest network.

----- Original message -----

From: Merle Keefe <mkeefe@sabinagoldsilver.com>

Date: 2021-11-29 12:38 p.m. (GMT-05:00)

To: "Pasalic, Omer" <omer.pasalic@rcaanc-cirnac.gc.ca>, Matthew Pickard <mpickard@sabinagoldsilver.com>

Cc: licensing <licensing@nwb-oen.ca>

Subject: RE: Sabina inspection report 2AM-BRP1831

Hi Omer,

Now that you are back, please find Sabina's response to the Inspection Report below. We're looking forward to discussing further with you. CIRNAC's inspection report noted the following 2 items as non-compliant in Section 2 of the document:

### 1.

#### *PART F: CONDITIONS APPLYING TO WASTE DISPOSAL AND MANAGEMENT:*

*14. Unless otherwise approved by the Board in writing, the Licensee shall not open burn plastics, wood treated with preservatives, electric wire, Styrofoam, asbestos or painted wood to prevent the deposition of waste materials of incomplete combustion and/or leachate from contaminated ash residual, from impacting any surrounding waters.*

Earlier in the report, it is also noted that Sabina "The licensee has installed a Burn Cage within the grounds of the main camp where it has been used to burn material, left over groceries, regular garbage, scrap and wood. Photograph of

*the Burn Cage is included in this report.”*

Sabina's disagrees with these findings and does not agree that there has been a non-compliance. Sabina has never open burned groceries, garbage, plastics, wood treated with preservatives, wires, Styrofoam, asbestos, or any other material requiring approval from the Board in writing. Sabina has only ever open burned clean wood and cardboard and we've rigorously implemented measures to ensure this is the case. Firstly, Sabina installed a cage to ensure uninhibited access by non-waste management personnel can occur – this cage is illustrated in the picture you provided. It's also important to note that Sabia has developed an approved Waste Management Plan by regulators, and an Open Burn SOP, which clearly indicate what can and cannot be burned openly – I have attached both of these documents and point you to Section 6.2 of the Waste Management Plan and Part 2, Item 4 of the Open Burn SOP. Perhaps most importantly, is the fact that no visible groceries or garbage is evident in the picture you provided in your inspection report, nor are they visible in the picture I have attached from a most recent burn on site.

Sabina takes our Waste Management extremely seriously. Our Waste Management Personnel have a lot of pride in it, and we take this accusation of open burning groceries and garbage very seriously. It is simply not the case which leads me to believe that miscommunication may have occurred on site Omer, however Sabina is requesting that a revised Inspection Report be issued with this non-compliance redacted or CIRNAC provide written confirmation that there was no non-compliance based on this additional information provided.

## 2.

### *PART H: CONDITIONS APPLYING TO EMERGENCY RESPONSE AND CONTINGENCY PLANNING:*

- 2. The Licensee shall prevent any chemicals, petroleum products or unauthorized Wastes associated with the Project from entering Water.*
- 3. The Licensee shall provide secondary containment for fuel and chemical storage as required by applicable standards and acceptable industry practice.*
- 8. The Licensee shall, subject to Section 16 of the Regulations, report any unauthorized deposits or foreseeable unauthorized deposits of waste and/or discharges of Effluent, and:*
  - a. Employ the Spill Contingency Plan;*
  - b. Report the incident immediately via the 24-Hour NWT/NU Spill Reporting Line (867) 920-8130 and to the Inspector at (867) 975-4295; and*
  - c. For each spill occurrence, submit a detailed report to the Inspector and the NWB, no later than thirty (30) days after initially reporting the event, which includes the amount and type of spilled product, the GPS location of the spill, and the measures taken to contain and clean up the spill.*

What exactly is the non-compliance here? Sabina requires additional clarity to understand the non-compliance.

There are also multiple comments in Section 1 of the inspection report which Sabina would like to clarify:

- Sabina's Project location is "Goose Lake" rather than "Goose Bay".
- The diesel spill next to Tank #7 occurred within the Bulk Fuel Containment Area, a fully lined engineered containment system, and not directly into the ground. Furthermore, Sabina disagrees it was a "large" spill and estimates it was between 5-10 litres.
- A car battery was not left unattended at the dock. This is a deep cycle marine battery utilized specifically for boating and completing environmental monitoring and baseline data collection.
- The Quonset, or "garage", is a fully lined building and any hydrocarbons that escape during vehicle maintenance do not seep directly into the ground but are captured.
- As noted above, Sabina does not openly burn groceries and regular garbage.
- Sabina has not constructed a new camp yet, but has completed initial construction of the Camp Pad where the camp will ultimately be constructed. The new Camp Pad is approximately 4km's east/north-East, not south.

As I mentioned above, we'd be happy to discuss the above with you in greater details and look forward to setting up a meeting!

Thanks,  
Merle

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**From:** Pasalic, Omer <[omer.pasalic@rcaanc-cirnac.gc.ca](mailto:omer.pasalic@rcaanc-cirnac.gc.ca)>  
**Sent:** Friday, November 5, 2021 11:39 AM  
**To:** Merle Keefe <[mkeefe@sabinagoldsilver.com](mailto:mkeefe@sabinagoldsilver.com)>; Matthew Pickard <[mpickard@sabinagoldsilver.com](mailto:mpickard@sabinagoldsilver.com)>  
**Cc:** licensing <[licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)>  
**Subject:** RE: Sabina inspection report 2AM-BRP1831

[Sender is external to Sabina Gold & Silver]

Good morning Merle,

I am out of the office until November 18<sup>th</sup>. We can set up a call then or I can answer questions you have briefly and elaborate more when we have msteams meeting.

Thanks,

Omer.

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**From:** Merle Keefe <[mkeefe@sabinagoldsilver.com](mailto:mkeefe@sabinagoldsilver.com)>  
**Sent:** Friday, November 5, 2021 10:35 AM  
**To:** Pasalic, Omer <[omer.pasalic@rcaanc-cirnac.gc.ca](mailto:omer.pasalic@rcaanc-cirnac.gc.ca)>; Matthew Pickard <[mpickard@sabinagoldsilver.com](mailto:mpickard@sabinagoldsilver.com)>  
**Cc:** licensing <[licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)>  
**Subject:** RE: Sabina inspection report 2AM-BRP1831

Hi Omer,

Thanks for sending this. We've reviewed now in full and I'd like to setup a call with you to discuss some of the findings you've noted, and in particular help clarify the non-compliance documented as it is unclear to me.

Please let me know when you are available to discuss.

Thanks,  
Merle

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**From:** Pasalic, Omer <[omer.pasalic@rcaanc-cirnac.gc.ca](mailto:omer.pasalic@rcaanc-cirnac.gc.ca)>  
**Sent:** Wednesday, October 27, 2021 6:57 AM  
**To:** Merle Keefe <[mkeefe@sabinagoldsilver.com](mailto:mkeefe@sabinagoldsilver.com)>; Matthew Pickard <[mpickard@sabinagoldsilver.com](mailto:mpickard@sabinagoldsilver.com)>  
**Cc:** licensing <[licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)>  
**Subject:** Sabina inspection report 2AM-BRP1831

[Sender is external to Sabina Gold & Silver]

Good morning Merle and Matthew,

Attached is the inspection report of Goose Bay/Sabina Gold and Silver site.

Again, thank you and thanks to your team for accommodating CIRNAC's visit to the site.

Have a great day,

Omer.

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