

WATER LICENCE INSPECTION FORM

☒ Original

☐ Follow-Up Report

| | |
|--|---------------------------------------|
| Licensee | Licensee Representative |
| Sabina Gold and Silver | Merle Keefe |
| Licence No. / Expiry | Representative's Title |
| 2AM-BRP1831 | Environmental permitting Manager |
| Land / Other Authorizations | Land / Other Authorizations |
| | -- |
| Date of Inspection | Inspector |
| June 19, 2022 | Jonathan MESHER |
| Activities Inspected | |
| <input checked="" type="checkbox"/> Camp | <input type="checkbox"/> Drilling |
| <input type="checkbox"/> Roads/Hauling | <input type="checkbox"/> Other: |
| <input checked="" type="checkbox"/> Mining | <input type="checkbox"/> Construction |
| | <input type="checkbox"/> Reclamation |
| | <input type="checkbox"/> Fuel Storage |
| | <input type="checkbox"/> Other: |

Conditions: **A - Acceptable** **C - Concern** **U - Unacceptable** **NA – Not Applicable** **NI – Not Inspected**

| Water Use | Condition | Comment | Site Conditions | Condition | Comment | Haz/Mat Management | Condition | Comment |
|--|-----------|---------|------------------------------|-----------|---------|------------------------------------|-----------|---------|
| Intake/Screen | NA | | Water Management Structures | NA | | Storage | C | |
| Flow Measure. Device | A | | Culverts / Bridges | A | | Spills | NA | |
| Source: | A | | Drainage | NA | | Spill Plan | NI | |
| Water Use: | A | | Erosion / Sediment | C | | | | |
| Recirculation (y /n) | NA | | Mitigation Measures | A | | Administrative | | |
| | | | Reclamation Activities | NA | | Records | NI | |
| | | | Materials Storage | NA | | Reports | NI | |
| Waste Disposal | | | Signage | | | Plans | NI | |
| Waste Water | NA | | | | | Notifications | A | |
| Solid Waste | C | | Monitoring | | | Other | | |
| Hazardous Waste | C | | Sample Collection / Analysis | A | | Follow-up from previous inspection | NI | |
| | | | | | | | | |
| *The number in the comments field will correspond with specific comments provided below. | | | | | | | | |
| Samples taken by Inspector: | | | Location(s): | | | | | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | | | | | | | |

SECTION 1 ☒ Comments ☐ Non-Compliance with Act or Licence ☐ Action Required

Background:
On June 19,2022, I Jonathan Mesher conducted inspections of the following facilities under the licence 2AM-BRP1831; Goose Camp, Gorge Camp and the Marine Laydown Area. During this inspection I was accompanied by; Kelli Gillard (NIRB), Guillaume Daoust (NIRB) and Merle Keefe (Licensee).

Goose Camp:
a. **Water Intake**
I. Water records appear up to date.
II. The road leading to the water intake appears to have signs of erosion, rutting and consists mostly of mud. Part D, item 7 of the licence 2AM-BRP states; “The Licensee shall implement sediment and erosion control measures prior to and during Construction, and Operations where necessary, to prevent entry of sediment into Water.”, therefore the inspector is requesting that the licensee install erosion control measures on both roads to prevent sediment from enter Goose lake. See photo 1 for one of the water intake roads.

b. **Waste Storage**
I. Temporary Waste Storage Facility- This facility had the following concerning items; Food waste, Oil filters and a fuel tank on a welder, The BACK RIVER PROJECT Landfill and Waste Management Plan, section 6.4.1 states the following; “Recyclable non-hazardous, non-combustible waste will be stored in dedicated waste storage facilities located at each of the Project sites” and “Indoor storage for beverage containers will be used to avoid attracting wildlife.”. Furthermore section 6.4.2 states that; “Hazardous waste will be stored inside or within lined containment facilities at the Goose Property and MLA to minimize potential leaching to the environment.” With the presence of the noted food waste and hazardous waste it appears the licensee is not adhering to the approved Landfill and waste management plan. See photos 2-4 for items noted.



- II. The licensee is depositing drill waste into a “sump” to the south of the main camp, in the licence a sump is defined as the following; “ means a structure or depression that collects, controls, and filters liquid waste before it is released to the environment. This structure should be designed to prevent erosion while allowing percolation of liquid waste;”. While on site the “sump” had limited freeboard, signs of erosion down gradient leading to ponding water and there appeared to be discoloration of the flora where the erosion lead to. See photos 5-8 for photos of the sump, overflow and potential discolorations from overflow.
- III. Historical waste pile- During the inspection the historical waste pile was sitting in ponding water and there appeared to be a visible sheen indicating hydrocarbon contamination, the inspector requested the licensee collect samples. The BACK RIVER PROJECT Landfill and Waste Management Plan, section 6.4.2 states that; “Hazardous waste will be stored inside or within lined containment facilities at the Goose Property and MLA to minimize potential leaching to the environment.” And section 12(1) of the Nunavut Waters and Nunavut Surface Rights Tribunal Act states that; 12 (1) Subject to subsection (2) and except in accordance with the conditions of a licence, no person shall deposit or permit the deposit of waste (a) in waters in Nunavut; or (b) in any other place in Nunavut under conditions in which the waste, or any other waste that results from the deposit of that waste, may enter waters in Nunavut. See photo 9 for the potential hydrocarbon contamination.
- IV. Hazardous materials outside of containment- See photo 10 for a tote of 0W40 (motor oil) outside of containment in the maintenance shop, See photo 11 for contaminated soil sitting on a liner, not contained, near the under ground shop area, see photo 12 for 5 totes outside of containment near the portal.

Section 2


☐ Comments

☐ Non-Compliance with Act or Licence

☒ Action Required

The licensee is to provide a plan 3 weeks after receiving the report to ensure the following concerns are addressed, this plan shall include a timeline for implementation.

- 1) The licensee is to implement erosion control measures at the water intake roads to prevent the entry of sediment into Goose Lake.
- 2) The licensee is to remove all Hazardous waste and food waste from the Waste Storage Area and store it in an approved manner.
- 3) The license is to provide a plan to ensure the “sump” is operating as a sump as defined in the licence and no longer over flowing into the surrounding water bodies.
- 4) The licensee is to provide an inventory of the historic waste pile, remove all waste from the ponding water and ensure all Hazardous waste is stored in secondary containment.
- 5) The licensee is to ensure all hazardous waste and hazardous materials is stored in a way to prevent waste from entering water and is consistent with the approved licence/Management plans.


| | |
|---|--|
| Inspector's Name | |
| Jonathan MESHER | |
| Signature | |
|  | |
| Date | |
| July 7, 2022 | |

Water Resource Officer, Nunavut Region
Crown Indigenous Relations and Northern Affairs Canada – CIRNAC
Jonathan.mesher@canada.ca
Office #: 867-222-0118
Fax: 867 979-6445

| Date | Camera | Inspector | Authorization |
|---------------|-----------------|-----------|---------------|
| June 19, 2022 | Sony Cyber-shot | J.Mesher | 2AM-BRP |

Photo Log

Photo 1




Description: Rutting leading to water intake.

| Date | Camera | Inspector | Authorization |
|---------------|-----------------|-----------|---------------|
| June 19, 2022 | Sony Cyber-shot | J.Mesher | 2AM-BRP |


Photo Log

Photo 2




Description: Oil filters.



| Date | Camera | Inspector | Authorization |
|---|-----------------|-----------|---------------|
| June 19, 2022 | Sony Cyber-shot | J.Mesher | 2AM-BRP |
| Photo Log | | | |
| Photo 3 | | | |
|  | | | |
| Description: fuel container. | | | |

| Date | Camera | Inspector | Authorization |
|--|-----------------|-----------|---------------|
| June 19, 2022 | Sony Cyber-shot | J.Mesher | 2AM-BRP |
| Photo Log | | | |
| Photo 4 | | | |
|  | | | |
| Description: Food waste (strong odor). | | | |


| Date | Camera | Inspector | Authorization |
|---|-----------------|-----------|---------------|
| June 19, 2022 | | | |
| | Sony Cyber-shot | J.Mesher | 2AM-BRP |
| Photo Log | | | |
| Photo 5 | | | |
|  | | | |
| Description: Sump with limited freeboard. | | | |

| Date | Camera | Inspector | Authorization |
|--|-----------------|-----------|---------------|
| June 19, 2022 | | | |
| | Sony Cyber-shot | J.Mesher | 2AM-BRP |
| Photo Log | | | |
| Photo 6 | | | |
|  | | | |

| Date | Camera | Inspector | Authorization |
|---------------|-----------------|-----------|---------------|
| June 19, 2022 | | | |
| | Sony Cyber-shot | J.Mesher | 2AM-BRP |

Photo Log

Photo 7



Description: Potentially discolored flora from the sump overflow. (looking towards the sump)

| Date | Camera | Inspector | Authorization |
|---------------|-----------------|-----------|---------------|
| June 19, 2022 | | | |
| | Sony Cyber-shot | J.Mesher | 2AM-BRP |

Photo Log

Photo 8



Description: Potential discoloration of the flora (looking away from sump).

| Date | Camera | Inspector | Authorization |
|---------------|-----------------|-----------|---------------|
| June 19, 2022 | | | |
| | Sony Cyber-shot | J.Mesher | 2AM-BRP |

Photo Log

Photo 9



Description: Historical waste pile and potential hydrocarbon contamination.

| Date | Camera | Inspector | Authorization |
|---------------|-----------------|-----------|---------------|
| June 19, 2022 | | | |
| | Sony Cyber-shot | J.Mesher | 2AM-BRP |

Photo Log

Photo 10



Description: Motor oil not in secondary containment.

| Date | Camera | Inspector | Authorization |
|---------------|-----------------|-----------|---------------|
| June 19, 2022 | | | |
| | Sony Cyber-shot | J.Mesher | 2AM-BRP |

Photo Log
Photo 11



Description: contaminated Soil outside of containment.

| Date | Camera | Inspector | Authorization |
|---------------|-----------------|-----------|---------------|
| June 19, 2022 | | | |
| | Sony Cyber-shot | J.Mesher | 2AM-BRP |

Photo Log
Photo 12



Description: Totes outside of containment.

