



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2AM-BRP1831
Our file - Notre référence
CIDM#1285728

June 2, 2020

Mr. Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's comments on the Sabina Gold & Silver submission of 2019 Annual Report for Type A Water Licence 2AM-BRP1831

Dear Mr. Dwyer,

Thank you for your March 31, 2020 email invitation to review and comment on the Sabina Gold & Silver submission of the 2019 Annual Report for Type A Water Licence 2AM-BRP1831.

Sabina Gold & Silver received the Type A Water Licence 2AM-BRP1831 on September 21, 2018, for the Back River Project. The development of pads, all-weather access roads and an airstrip at the Marine Laydown Area (MLA), and establishment of a tent camp and barge off-loading area were documented in the 2018 Annual Report for Water Licence 2BC-BRP1819. In the 2019 Annual Report, it was indicated that no ore was mined, and waste rock was not generated in 2019. Sabina also completed several key additional pre-development activities at the Back River Project focused on advancing and de-risking future development, including:

- Construction and operation of Sabina's inaugural WIR which included successful delivery of equipment, supplies, and other goods to the Goose Property necessary for construction of the Back River Project;
- Completion of a cargo sealift;
- Preliminary construction of a bulk fuel storage tank at the MLA; and
- Continued gold exploration and resource definition at the Goose Property.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) conducted this review pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and*



Northern Affairs Act. Please find in this letter two CIRNAC comments and recommendations for consideration by the Nunavut Water Board.

Part E Item 5 of the water licence states 'total combined Water Use for this purpose shall not exceed six hundred and seventy-five (675) cubic metres per year per kilometre of road.' CIRNAC appreciates the monthly and annual withdrawal values submitted by Lake in the 2019 Annual Report for the winter ice road. CIRNAC recommends that the calculated volume of water per year per kilometre of winter ice road be included in the 2020 Annual Report.

Part I Item 15 of the water licence states 'the Licensee shall annually review the QA/QC Plan and modify the Plan as necessary. Proposed changes shall be submitted to an Accredited Laboratory for approval.' CIRNAC recommends that the licensee provide confirmation that the QA/QC Plan was modified and proposed changes were submitted to an Accredited Laboratory for approval in 2019.

CIRNAC appreciates the opportunity to participate in this review. If there are any questions, please contact me at (867) 975-4550 or godwin.okonkwo@canada.ca.

Sincerely,

Godwin Okonkwo
Manager, Water Resources