



June 16, 2020

Richard Dwyer
Manager of Licencing
Nunavut Water Board
PO Box 119
Gjoa Haven, NU
X0B 1J0

Re: Response to CIRNAC Comments on Sabina's 2019 Annual Report for Water Licence 2AM-BRP1831

Dear Richard,

On June 2, 2020, Crown-Indigenous Relations and Northern Affairs (CIRNA) submitted to the Nunavut Water Board (NWB) two comments concerning Sabina Gold & Silver Corp.'s (Sabina) 2019 Annual Report for Water Licence 2AM-BRP1831 (the Licence). This was the first annual report filed under this Licence, which was issued September 21, 2018. Sabina is herein providing response to CIRNAC's comments.

CIRNA requested that Winter Ice Road water usage be reported in future as a quantity per kilometer of road to better allow comparison with the Water Licence water usage allotment of 675 m³/km. Sabina agrees to standardize this water usage in this manner, and can confirm that 2019 WIR water usage was 333 m³/km; below the Licence limit of 675 m³/km.

CIRNA also sought confirmation that Sabina had reviewed the Back River Project QA/QC plan (the Plan) and, if any changes were necessary, requested that this Plan be submitted to an Accredited Laboratory for approval. Sabina confirms that this Plan was internally reviewed and no significant changes were deemed necessary, but that the Plan has not been approved by an Accredited Laboratory. Sabina will complete this process and provide the final Plan and approval of an Accredited Laboratory to the NWB once received. In future annual reports Sabina will include confirmation of this review.

Sabina appreciates CIRNA's review of the annual report and suggestions for improvement.

Sincerely,

Merle Keefe

Manager, Environmental Permitting
Sabina Gold & Silver Corp.
#1800 – 555 Burrard Street
Vancouver, BC V7X 1M9