



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#1288238

September 10, 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](mailto:licensing@nwb-oen.ca)

**Re: Crown-Indigenous Relations and Northern Affairs Canada comments on the Water Licence 2AM-BRP1831 Rascal Diversion Berm Detailed Report for the Back River Project by Sabina Gold and Silver Corp.**

Dear Mr. Dwyer,

Thank you for your August 27, 2020 email invitation for review and comment on the Rascal Diversion Berm Detailed Report. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), 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*, reviewed the application and would like to provide two comments and recommendations to the Nunavut Water Board (NWB) for consideration.

1. Quarry Monitoring: CIRNAC notes that the report indicates the summary of Non-Potentially Acid Generating (NPAG) quarry rocks produced will be reported in the Annual Report. CIRNAC recommends that the summary of the quantities of the Potentially Acid Generating (PAG) rocks excavated and deposited in the WRSA be also included in the Annual Report.
2. Fuel spill: The report states that *'all fueling will be done away from watercourses and water bodies, and a spill protocol will be in place'*. CIRNAC recommends that this spill protocol be developed before the Rascal Diversion Berm construction.

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

Sincerely,

Godwin Okonkwo  
Manager Water Resources

Canada