



Rascal Diversion Berm Detailed Report_Sabina Gold & Silver_Back River Project

Merle Keefe <mkeefe@sabinagoldsilver.com>
To: Richard Dwyer <richard.dwyer@nwb-oen.ca>
Cc: Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>

Fri, Oct 23, 2020 at 11:39 AM

Hello Richard,

Please find below Sabina's responses to comments received on the Back River Project Rascal Diversion Berm Detailed Report.

CIRNAC Comments/Recommendations

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.
 - **Sabina Response:** Quantities of PAG rocks excavated and deposited in the permitted WRSA's will be included in Sabina's 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.
 - **Sabina Response:** Sabina's Back River Project Spill Contingency Plan will be implemented, which was developed and approved through the FEIS and Type A Water Licence regulatory processes.

ECCC Comments/Recommendations

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1. ECCC recommends the use of neutralization potential/acid generation potential (NP/AP) ratio of greater than 3 as classification criteria, as proposed.
 - **Sabina Response:** Sabina thanks ECCC for their review and comments.

Thanks,

Merle Keefe, EIT

Manager, Environmental Permitting

Sabina Gold & Silver Corp.



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Subject: Re: Rascal Diversion Berm Detailed Report_Sabina Gold & Silver_Back River Project

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