



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
GCDocs# 100498377

January 25, 2022

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 Review of the Back River Project Gander Culvert Crossing Detailed Report submitted by Sabina Gold & Silver Corp. Water Licence 2AM-BRP1831

Dear Mr. Dwyer,

Thank you for the December 23rd, 2021 invitation to review the Back River Project Gander Culvert Crossing Detailed Report submitted by Sabina Gold & Silver Corp. Water Licence 2AM-BRP1831

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application 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 CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at (306) 501-4047 or Andrew.Keim@canada.ca.

Sincerely,

Andrew Keim,
Water Resources, Nunavut Regional Office
Crown-Indigenous Relations and Northern Affairs Canada
Andrew.Keim@Canada.ca / Tel : (306) 501-4047



Technical Review Memorandum

Date: January 21, 2022

To: Richard Dwyer, Manager of Licensing, Nunavut Water Board

From: Andrew Keim, Water Resources, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada Review of the Back River Project Gander Culvert Crossing Detailed Report submitted by Sabina Gold & Silver Corp. Water Licence 2AM-BRP1831**

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

A. BACKGROUND

On December 22, 2021 Gold & Silver Corp. (Sabina) submitted, for the consideration of parties, documents related to Back River Project Gander Culvert Crossing including design basis and considerations, engineering design and drawings planned for the Back River Project.

The Back River Project (BRP) underground and open pit mineing activities as well as an airstrip and mill at the Goose property, a marine laydown area on Bathurst Inlet, and a 160 km long winter road. The Project will require a total of four stream crossings along the proposed Goose Property haul road. Crossings with culvert installations have been designed to convey storm peak flows.

In accordance with Sabina's Type A Water Licence (No. 2AM-BRP1831), Sabina has submitted to the Nunavut Water Board (the Board) for review, at least sixty (60) days prior to Construction, the proposed Gander Culvert Crossing Detailed report (Part D, Item 3).

CIRNAC provides the following comments and recommendations pertaining to the application package.

Documents reviewed as part of this submission can be found in Table 1 of Section B. Detailed technical review comments can be found in Section C.



B. DOCUMENTS REVIEWED

The following table (Table 1) provides a summary of the documents reviewed and referenced under the submission.

Table 1: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
211222 2AM-BRP1831 Appendix A Drawings	Sabina Gold and Silver Corp.
2AM-BRP1831 Water License	Nunavut Water Board, 2018
211222 2AM-BRP1831 Appendix B Arctic Grayling Passage Criteria	Golder Associated Ltd, Nov 9,2021
211222 2AM-BRP1831 Gander Crossing Detailed Report and Drawings	Sabina Gold and Silver Corp.

C. RESULTS OF REVIEW

Comment: CIRNAC reviewed the provided information and was able to confirm directly with the Licensee that work to install this and future culverts would be completed during the frozen ground period to prevent erosion and sedimentation of the bed Creek.

Recommendation:

(R-01) CIRNAC recommends that the Licensee take all measures to ensure that the culvert is properly secured into the bed of the creek to prevent underselling and the failure of the culvert during a period of high volume rain. This will also ensure that sufficient erosion and sediment control measures are implemented to prevent accumulation downstream.