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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

File No: **2AM-BRP1831/TR/D2, D3**

February 2, 2022

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**RE: NWB Technical Review of the Gander Culvert Crossing Detailed Report and Drawings; Back River Project; Water Licence No: 2AM-BRP1831**

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Dear Mr. Keefe and Mr. Pickard:

The Nunavut Water Board (NWB or Board) has completed its technical review of the construction design report entitled “*Gander Culvert Crossing Detailed Report*” dated December 2021 (Design Report) provided to the Board by Sabina Gold & Silver Corp. (Sabina or Licensee) on December 22, 2021 to fulfill the requirements of Part D, Item 2 of Water Licence No: 2AM-BRP1831 (Licence).

In its submissions, Sabina states: “*The development of the Back River Project (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 the design storm peak flows. The design of the crossings was first considered in the Project Feasibility Study, completed in 2015, and since then additional checks and modifications to improve constructability have been completed. As part of the Detailed Engineering phase, the terrain and permafrost considerations at the water crossings, and various options for these water conveyance structures were re-examined. Trade-off between suitable water conveyance structures were completed to support future decision and design. The text below describes the Gander Crossing location specifically.*” Sabina also notes that the construction of this crossing is planned to commence in 2022.

The Design Report summarizes the site conditions, design basis and key parameters adopted for design, and for-construction design drawings, as required under Part D, Item 3 of the Licence.

Upon receipt, the submission was distributed for public review with a deadline of January 21, 2022.

On January 19, 2022, January 26, 2022, and January 27, 2022, the comments were received from Environment and Climate Change Canada (ECCC), Crown-Indigenous Relations and Northern Affairs (CIRNA), and the Kitikmeot Inuit Association (KIA), respectively. In their submissions, the KIA and ECCC indicated that they had no comments on the Design Report. CIRNA clarified that they were “*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*” and recommended 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.*”

All correspondence relevant to this submission is available from the NWB’s FTP site using the following link:

<ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-BRP1831%20Sabina/3%20TECH/D%20CONST&OPER/>

By copy of this letter, the Board acknowledges that the Design Report addresses the requirements of Part D, Item 3 of Water Licence No: 2AM-BRP1831, and has accepted the Design Report, as required under Part D, Item 2 of the Licence, contingent upon acceptance by the Fisheries and Oceans Canada (DFO).

The Licensee is advised that the Board's "acceptance" of this document is a verification that the proposed activities are consistent with the existing terms and conditions of the Licence, and more specifically with Part D, Item 3, and may proceed in accordance with the Design Report and drawings provided. It should be noted that the Board's "acceptance" is NOT intended or offered as any representation regarding the suitability of the plans nor third party verification of the design, construction, planning or engineering discussed in the documents.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (extension 29) or [sergey.kuflevskiy@nwb-oen.ca](mailto:sergey.kuflevskiy@nwb-oen.ca), at your convenience.

Sincerely,  
**NUNAVUT WATER BOARD**



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Sergey Kuflevskiy  
Technical Advisor

Cc: Distribution List – Back River Project