



NWB Tools

Richard Dwyer <richard.dwyer@nwb-oen.ca>

Sabina's Back River Project Type A Water Licence 2AM-BRP1831 (Amendment No.1) (the Licence) Part E, Item 2

Merle Keefe <mkeefe@sabinagoldsilver.com>

Thu, Mar 31, 2022 at 3:47 PM

To: Richard Dwyer <richard.dwyer@nwb-oen.ca>

Cc: Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>, Matthew Pickard <mpickard@sabinagoldsilver.com>

Hello Richard,

Sabina's Back River Project Type A Water Licence 2AM-BRP1831 (Amendment No.1) (the Licence) Part E, Item 2 requires Sabina to "on or before March 31, 2022, submit for Board review a revised *Water Management Plan*. The updates are to take into account commitments made with respect to submissions received during the technical review of the Application, as well as final submissions and issues raised during the Public Hearing process."

Sabina also notes, Licence Part E, Item 1 requires Sabina to "implement the *Water Management Plan* as approved by the Board. The Plan shall be reviewed periodically to reflect changes in operations and/or technology and submitted for Board review with the Annual Report in accordance with Part B, Item 16."

Sabina is also required under Licence Part E, Item 15 to "on or before March 31, 2022, submit to the Board for review an updated hydrodynamic model (HDM) including mixing zone design (MZD). Consistent with the Water Management Plan (WMP), the HDM/MZD updates would take into account commitments made with respect to submissions received during the technical review of the Application, as well as final submissions and issues raised during the Public Hearing process."

Sabina's updated feasibility study completed in 2021 triggered additional changes to the WMP and review of the water and load balance model (WLBM) to reflect potential changes in operation and technology. Sabina also notes that additional field ground-truthing baseline studies were completed in summer of 2021, the results of which can be used in the calibration of the HDM and WLBM.

Sabina is respectfully requesting a one-month delay in submission of the updated WMP under Part E, Item 2 so as to properly include changes resulting from the updated feasibility study. If granted, Sabina is also proposing the following to streamline its approach to meeting the requirements under the terms and conditions of the Licence, and to support Board review requirements relating to multiple WMP, HDM, MZD and WLBM submissions in 2022:

- **Part E, Item 2:** Sabina is requesting a submission date of April 29, 2022, for the updated WMP. In addition to incorporating changes resulting from the updated feasibility study, the updated WMP would consider commitments made with respect to submissions received during the technical review of the Application, as well as final submissions and issues raised during the Public Hearing process. The WMP would also consider preliminary results of water quality modelling to support the updated HDM currently underway.
- **Part E, Item 15, and Item 16:** Sabina proposes to submit a final HDM and MZD, and updated WLBM including additional groundwater modelling and water quality modelling to the Board by August 30, 2022. The HDM, MZD and updated WLBM would consider commitments made with respect to submissions received during the technical review of the Application, as well as final submissions and issues raised during the Public Hearing process, and the results of the additional field ground-truthing baseline studies.

Thanks very much,

Merle

Merle Keefe, P.Eng

Manager, Environmental Permitting

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