



P.O. Box 360
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Kugluktuk	Richard Dwyer, Manager of Licensing Nunavut Water Board P.O. Box 119 Gjoa Haven, Nunavut X0B 1J0
Bathurst Inlet Kingaok	August 14 th , 2019
Bay Chimo Umingmaktok	Re: Sabina Gold & Silver Corp. Type A Water Licence 2AM-BRP1831 request for change to Schedule I.
Cambridge Bay Ikaluktutiak	Dear Richard Dwyer, the KIA has reviewed Sabina's request for a change to Schedule I of the Type A Water License 2AM-BRP1831 for the Marine Laydown Area (MLA) of the Back River Project.
Gjoa Haven Okhoktok	The proposed Maximum Allowable Concentrations are more stringent than those outlined in NWB adopted guidelines and are acceptable. The proposed change to the monitoring frequency is acceptable and continues to meet the intended goal, to assess compliance with effluent criteria for sewage discharges from the MLA.
Taloyoak	The primary proposed change in monitoring BRP-42 is with respect to where samples will be collected. Sewage at the MLA will continue to discharge to tundra at a point where "the expected flow path to the nearest receiving environment (Bathurst Inlet) will be greater than 1.5 km", but the monitoring point is proposed to be adjusted from "at the point of discharge" to "representative drainage at a point of entry into the marine receiving environment" (Sabina 2019). This proposed change is compliant in principle with the intent of the NWB guidelines, which are intended to apply to the marine environment within a mixing condition. Additional detail is required from the proponent to confirm that monitoring "representative drainage" will be sufficient to assess compliance as outlined in Section 4.3 of the "Guidelines for the Discharge of Treated Municipal Wastewater in the Northwest Territories".
Kugaaruk	KIA therefore requests that Sabina provide additional information on how the ultimate monitoring point will be selected to assess compliance with the discharge criteria. Specifically, we request detail as to how "representative drainage at a point of entry into the marine receiving environment" will be determined. KIA further requests that Sabina clarify that the point of compliance for BRP-42 will be on land as opposed to within the marine environment itself.



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Thank you

A handwritten signature in black ink that reads "John Roesch". The signature is written in a cursive style.

John Roesch, P.Eng.

Senior Hope Bay Project Officer
Kitikmeot Inuit Association, Department of Lands and Environment