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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No: **2AM-BRP1831**

November 3, 2020

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RE: NWB Technical Review of the Aquatic Baseline Synthesis Report; Back River Project; Water Licence No: 2AM-BRP1831

Dear Mr. Keefe and Mr. Pickard:

The Nunavut Water Board (NWB or Board) has completed its technical review of the report entitled “Sabina Gold and Silver Corp. Back River Project - Aquatic Baseline Synthesis Report, Appendix A to the Aquatic Effects Management Plan” dated July 2019 (Report) provided to the Board by Sabina Gold & Silver Corp. (Sabina or Licensee) on September 21, 2020 to fulfill the requirements of Part E, Item 15(a) of Water Licence No: 2AM-BRP1831 (Licence).

The Report includes updated 2017-2018 baseline data collection and takes into account seasonal variation, as required under Part E, Item 15(a) of the Licence. In its submissions, Sabina states: “[T]his aquatic baseline synthesis report was developed to report the results of the 2018 AEMP [Aquatic Effects Management Plan] sampling program and evaluate the baseline dataset. The updated AEMP design will refer to this synthesis report for baseline information. The compiled baseline dataset, which takes into account seasonal variation, will also support future updates to the Water and Load Balance Model”.

Upon receipt, the submission was distributed for a three (3) week public review with a deadline of October 13, 2020.

On or before the deadline, the comments were received from the Kitikmeot Inuit Association (KIA), Crown-Indigenous Relations and Northern Affairs (CIRNA) and the Environment and Climate Change Canada (ECCC). In its submission, CIRNA indicated that they did not identify any issues with the Report. The ECCC requested further clarification with respect to the baseline dataset for Propeller Lake and the sample size of the Lake Trout data, and recommended

additional under-ice data collection. The KIA recommended to collect additional data from all sites to support normal range calculations and requested to clarify how the censored water quality data will be treated to support normal range calculations and future Before-After-Control-Impact (BACI) statistical analysis.

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/1%20AQUATIC%20EFFECTS%20MONITORING/I2%20Baseline%20Data/>

On October 23, 2020, Sabina provided their responses to the interveners' comments. In their response to the ECCC comments Sabina *proposed to collect water quality data in Propeller Lake starting in Year 8 to accumulate at least three years of data before a potential mine-related influence on Propeller Lake water quality*, agreed to collect another year of under-ice water quality data for Goose Lake and Reference B Lake, and clarified that *the additional Lake Trout data will be collected during the fish health surveys [...] to augment the baseline dataset for normal range calculations*. With respect to the KIA's comments, Sabina confirmed that another year of under-ice water quality data will be added to the baseline dataset and clarified that *non-detect values were replaced with one half the detection limit when calculating summary statistics* and that *the same method will be used when calculating normal ranges for BACI analysis*.

On October 26, 2020 and October 30, 2020, the confirmation of satisfaction with Sabina's responses was received from the ECCC and the KIA, respectively.

By copy of this letter, the Board acknowledges that the Report addresses the requirements of Water Licence No: 2AM-BRP1831, and has accepted the Report, as required under Part E, Item 15(a) of the Licence.

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

Sincerely,



Sergey Kuflevskiy
Technical Advisor
NUNAVUT WATER BOARD

Cc: Distribution List – Back River Project