



Karén Kharatyan
A/Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

September 13, 2017

RE: Type B Water Licence for Development Work related to the Mining of the Back River Project

Dear Mr. Kharatyan,

Sabina Gold & Silver Corp. (Sabina) is submitting this revised Type B Water Licence application and supporting documents (Application) for proposed development work, ongoing exploration mobilization and site preparation work related to the Back River Project (Project). The original application submitted in October 2014 (8BC-BPR----) is formally withdrawn by Sabina and replaced with the current Application.

Full development of the Project requires Sabina to undergo a review by the Nunavut Impact Review Board (NIRB) to obtain a project certificate and to obtain a Type A Water Licence from the Nunavut Water Board (NWB or Board). Sabina submitted the Final Environmental Impact Statement (FEIS) and FEIS Addendum¹ to the NIRB. A Type A Water Licence application will be filed shortly.

The regulatory framework provided in the Nunavut Agreement (Agreement) (Section 13.5.5) and the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NWNSRTA or Act) allows for interim, short-term approvals for water uses related to exploration or development work for a proposal under development impact review. The NWB is not restricted from issuing an interim, short-term period water licence for development work related to the Project. Sabina's Type B Water Licence application includes the:

1. Application Form for Type B Development Works
2. Main Application Supporting Document (MASD) for Type B Development Works and appendices
3. Concordance Assessment for Type B Development Works
4. Supplemental Document:
 - a. D.1 Road Management Plan
 - b. D.2 Fuel Management Plan
 - c. D.3 Quarry Management Plan³
 - d. D.4 Comprehensive Spill Contingency Plan²
 - e. D.5 Interim Closure and Reclamation Plan
 - f. D.6 Environmental Management and Protection Plan
 - g. D.7 Oil Pollution Emergency Plan

¹ FEIS submitted to NIRB in November 2015. FEIS addendum submitted to NIRB in February 2017.

² Revised Spill Plan associated with 2BE-GOO1520, 2BE-GEO1520 and 2BE-MLL1722 to reflect development works.

³ Revised Addenda associated with 2BE-GOO1520 Quarry Management Plan (July 2017).

Sabina believes the scope of activities proposed for this Application are consistent with scope identified in the Project Proposal submitted to the NIRB for review. By copy of this letter to the NIRB, Sabina is requesting that NIRB provide the NWB with written confirmation that while development impact review is ongoing, the scope of works proposed can be processed as a short interim approval consistent with Agreement Article 13.5.5, and the NWB can proceed with regulatory review of the Type B Application.

Sabina would like to confirm Golder Associates Ltd. as applicant representatives for the purposes of this Application. In addition, Sabina confirms our financial responsibility is adequate for completion of the undertaking, mitigating adverse impacts, ongoing maintenance, reclamation, and restoration of the undertaking. Sabina is confident in assuming its position taking into account its current ongoing and past performance in the Kitikmeot Region, Nunavut, and Canada.

I trust the above and attached information meets the NWB requirements for a Type B Water Licence for the Back River Project. Should you have any questions, please do not hesitate to contact me at the below.

Yours truly,



Matthew Pickard
Vice President, Environment and Sustainability
Sabina Gold & Silver Corp.
#1800 - 555 Burrard Street
Box 220
Vancouver, BC V7X 1M9

CC: Nunavut Impact Review Board

Attachments: A - Water Licence Application Form
B - NTS sheet 076G and 076J Scale 1:50,000
B1-NPC Conformity
B2-NWB acknowledgment of Fees
C - Main Application Supporting Document