

Table 1 - File # 8BC-BRP--- Issues Identified during the NWB's Initial Internal Review of the Application				Sabina Response
Item #	Topic	Issue	Comments/Recommendations	
Water Licence Application Form				
1	Project Name (Box # 3)	It is understood that the scope of the initial development component of the Project is expected to be included under potential Licence No. 8BC-BRP--- if issued while the scope of the overall Project is expected to be captured under a new potential Licence No. 2AM-BRP---- if issued. It is, however, recommended that a distinguishable name be used for the development works component of the Project to avoid confusion; even if, both potential licences, if issued, are expected to be eventually amalgamated.	It is understood that the scope of the initial development component of the Project is expected to be included under potential Licence No. 8BC-BRP--- if issued while the scope of the overall Project is expected to be captured under a new potential Licence No. 2AM-BRP---- if issued. It is, however, recommended that a distinguishable name be used for the development works component of the Project to avoid confusion; even if, both potential licences, if issued, are expected to be eventually amalgamated.	<p>The Project is defined as the Back River Gold Mine Project. The Project nomenclature does not differ, but rather it is the classification or type of activities that defines the type of license being applied for. The distinguishable name within the application is “Development Works” consistent with the terminology used in S.13.5.5 of the Nunavut Agreement.</p> <p>Sabina believes the application clearly defines the activities to be considered as “Development Works” for the Back River Project. This is consistent with similar applications filed for development works (i.e. Meliadine Project and Mary River). The 8BC-BRP application is an application specific for development works under S.13.5.5 for a project already under development impact review and as such should be considered in the context of the full project. This approach is consistent with direction provided by NWB on August 10, 2017.</p>
2	Pre-licensing Requirement (Box # 7)	The NPC's Land Use Conformity determination for the proposed Project/component is	For completeness, it is recommended that the Proponent submit to the NWB for consideration a copy of the NPC's	<p>On an August 10, 2017 call with the NWB and other regulatory authorities, Sabina discussed whether a conformity determination would be required. During the call, it was confirmed that as all activities included in the 8BC-BRP--- application were included in the Back River Project NIRB</p>

		absent from the Application.	determinations for file # 8BC-BRP---- ; even if, the project is not located within a region in which there is no approved land use plan in place.	<p>review no further conformity determinations are required in order to proceed with the Type B. This is consistent with previous NWB process.</p> <p>As context, NPC has indicated in the Water Licence applications for the Project that there is not an approved land use plan for the West Kitikmeot Region and conformity is not required.</p> <p>Refer to Attachment B1 to the Revised Application Form Version 2.0 for copy of Project conformity determination.</p>
3	Pre-licensing Requirement (Box # 8)	Reference to the NIRB's 2012 Screening Decision/Determination was included in the Application to satisfy the relevant information requirement.	It is recommended that the Proponent submit to the NWB, for consideration, confirmation from the NIRB that indicates the 2012 NIRB's determination is still valid in the context of file # 8BC-BRP-----.	<p>Refer to response for Item 2 above.</p> <p>The application for development works submitted in accordance with S.13.5.5. of the Nunavut Agreement should be considered in the context of the full Project under development impact review.</p> <p>Should the NWB upon issuance of the application for public review seek to confirm "scope of activities" are within the scope of the full mining project as an abundance of caution, Sabina has provided a concordance assessment of activities being considered for development works and where this information was provided in the context of the FEIS or FEIS addendum.</p> <p>See Box #9, Table 2.</p>
4	Scope of the development works Licence Versus Licence	It is somewhat unclear as to extent to which the scope of existing Type "B" Licences No. 2BE- GEO1520 and 2BE- GOO1520 are separate from that of the scope of	It recommended that a clear demarcation be made for the scope of Licences 2BE- GEO1520 and/or 2BE- GOO1520 and that of the potential 8BC-BRP--- Licence.	<p>Sabina notes that Section 3.1 and Section 3.2 of the Main Application Supporting Document demarcate activities and works already scoped and approved under existing NWB Type B Water Licences 2BE- GEO1520 and/or 2BE-GOO1520 versus those proposed under the potential 8BC-BRP--- Licence. Also, please refer to the table provided in Box #9 and note the footnotes that highlight activities already scoped in existing licenses. See summary in Box #9, Table 2.</p>

	No. 2BE-GEO1520 and 2BE-GOO1520 (Box 9)	potential Licence No. 8BC-BRP---- in terms of water requirements, camp use, and waste management, and other Project components.	Details should be provided on how intersected components associated with the existing Type “B” licences would be addressed, especially where amendments those licences will be required to support the potential 8BC-BRP---- Licence.	This approach to clearly identifying actives is consistent with the approach used in other similar applications. (i.e. Whale Tail).
5	Licence Term (Box #25)	The application states that the licence should be valid for the first quarter of 2018 until a Type “A” licence is issued to the Project.	It is recommended that the Proponent provide the exact term for which the Licence would be required as the NWB cannot issue a licence for an unspecified term/period.	Sabina requests the term of the Licence be at least 1 year from date of issuance.
6	Water Use Fee (Box # 27)	The Application states that the processing fee will be paid following confirmation of receipt by the NWB.	It is recommended that the Proponent provide the required fee for processing the Application given that NWB has already confirmed receipt.	<p>Sabina respectfully notes the Application fee and Water Use fee deposit were paid as part of the original application (NWB File No: 8BC-BRP----). NWB acknowledgement and Receipt of Application Fee and Water Use Fee Deposit can be found here:</p> <p>http://www.nwb-oen.ca/public/registry/8%20MISCELLANEOUS/8B/8BC%20-%20Construction/8BC-BRP----%20Sabina/2%20ADMIN/0%20GENERAL/141106%208BC-BRP----receipt%20of%20admin%20and%20WU%20fees%20deposit%20cheque-OAAE.pdf</p> <p>Refer to Attachment B2 to the Revised Application Form Version 2.0.</p>
Management Plans				

7	Blasting	While a bit of information is provided in the main document and the quarry management plan regarding blasting, a comprehensive plan was not provided.	It is recommended that a plan to manage blasting activities be provided if such activities are going to be conducted proximal to or likely to affect fresh waterbodies.	<p>Sabina notes the requirement and authority for review of a comprehensive blasting management plan rests with Natural Resources Canada under the <i>Explosives Act</i> and Regulations.</p> <p>For NWB's consideration, an Explosives Management Plan has been appended to the Quarry Management Plan. This plan provides information on explosives manufacture, transport, storage, handling and use at the Back River Project.</p>
Main Application Supporting Document				
8	NPC Determination (Section 2.1)	Please refer to the comments provided for Item No. 2 above.	Please refer to the comments provided for Item No. 2 above.	Refer to Box #7 of the Application Form. (See also Item 2 above)
9	NIRB Determination (Section 2.2)	Please refer to the comments provided for Item No. 3 above.	Please refer to the comments provided for Item No. 3 above.	Refer to Box #8 of the Application Form. (See also Item 3 above)
10	Development Works (Section 3)	Please refer to the comments provided for Item No. 4 above.	Please refer to the comments provided for Item No. 4 above.	Refer to Box #9, Table 2 of the Application Form. (See Item 4 above)