

<b>Interested Party:</b>	Transport Canada	<b>No.:</b>	1
<b>Subject:</b>	Project Description		

**Reference to Application:** N/A

**Comment:**

Sabina has made no mention of over-wintering of barges and is advised that if overwintering is to take place, TC must be provided with the operations plan and risk assessment for over-wintering of a vessel to determine if required regulatory requirements are met.

**Sabina Response:**

Sabina confirms that no overwintering of barges is proposed as part of SPW.

<b>Interested Party:</b>	Transport Canada	<b>No.:</b>	2
<b>Subject:</b>	Project Description		

**Reference to Application:** N/A

**Comment:**

Sabina is to confirm that there is adequate water depth for safe navigation of barges into the proposed Marine Laydown Area (MLA) in southern Bathurst Inlet.

**Sabina Response:**

Sabina, and others, have utilized barges within Bathurst Inlet in the past and it has been demonstrated that the depths are adequate for the safe movement of barges into Bathurst Inlet. We will continue to meet all regulatory requirements related to marine transport.

<b>Interested Party:</b>	Transport Canada	<b>No.:</b>	3
<b>Subject:</b>	Oil Pollution Emergency Plan (OPEP)		

**Reference to Application:** N/A

**Comment:**

In their response to Transport Canada's technical comment number one, Sabina committed to amending the legislative requirement section of the OPEP to comply with section 168(1) (b) (iii) of the Canada Shipping Act, 2001. This requirement is not reflected in the updated OPEP.

**Sabina Response:**

This SPW application was submitted prior to the Technical Hearings when this commitment was made and Sabina committed to making the edits as part of the FEIS submission. The OPEP provided in the Site Preparation Work Application is a modified version of the document provided in the DEIS. Sabina commits to capturing this requirement in an updated version of the OPEP provided to Transport Canada 60 days prior to shipping or in the FEIS, whichever comes first.

<b>Interested Party:</b>	Transport Canada	<b>No.:</b>	4
<b>Subject:</b>	Oil Pollution Emergency Plan (OPEP)		

**Reference to Application:** Appendix I - OPEP

**Comment:**

Appendix I - OPEP; Sabina will be required to confirm and state in the OPEP that the lighting used at the bulk fuel storage facility meets the requirements of the Vessel Pollution and Dangerous Chemical Regulations.

**Sabina Response:**

Sabina confirms that all requirements of the Vessel Pollution and Dangerous Chemical Regulations will be met. Sabina commits to capturing this requirement in an updated version of the OPEP provided to Transport Canada 60 days prior to shipping.

<b>Interested Party:</b>	Transport Canada	<b>No.:</b>	5
<b>Subject:</b>	Oil Pollution Emergency Plan (OPEP)		

**Reference to Application:** Annex 5, page 36; Bulk Cargo Transfer Procedures

**Comment:**

Annex 5, page 36; Bulk Cargo Transfer Procedures states that “bulk fuel transfer procedures are proprietary to the barge operator and the selection of fuel supplier is a commercial element of the project which shall be determined at a future date prior to commencement of operations”. Transfer Procedures are a requirement under the Vessel Pollution and Dangerous Chemical Regulations, and should be reflected in the updated OPEP, which is to be submitted to Transport Canada prior to the commencement of the project.

**Sabina Response:**

Sabina confirms that all requirements of the Vessel Pollution and Dangerous Chemical Regulations will be met. Sabina commits to capturing this requirement in an updated version of the OPEP provided to Transport Canada 60 days prior to shipping.

<b>Interested Party:</b>	Transport Canada	<b>No.:</b>	<b>6</b>
<b>Subject:</b>	Oil Pollution Emergency Plan (OPEP)		

**Reference to Application:** N/A

**Comment:**

Canadian Coast Guard (CCG) resources should not be utilized as a means to respond to spills. Sabina is required to demonstrate procedures for responding to a spill larger than the level 1 minimum spill size.

**Sabina Response:**

Sabina will comply with all regulatory requirements for spill response.

<b>Interested Party:</b>	Transport Canada	<b>No.:</b>	7
<b>Subject:</b>	Oil Pollution Emergency Plan (OPEP)		

**Reference to Application:** N/A

**Comment:**

Sabina is requested to provide a revised and updated OPEP which demonstrates that the requirements of the CSA 2001 Part 8, the relevant regulations and standards outlined below can be met prior to commencing this Project and throughout the Project life:

- Response Organization and Oil Handling Facility Regulations
- Vessel Pollution and Dangerous Chemicals Regulations
- Environmental Response Arrangement Regulations
- Oil Handling Facilities Standards (TP 12402)
- Release and Environmental Emergency Notification Regulations

**Sabina Response:**

Sabina commits to capturing this requirement in an updated version of the OPEP provided to Transport Canada 60 days prior to shipping.

<b>Interested Party:</b>	Transport Canada	<b>No.:</b>	8
<b>Subject:</b>	Appendix B		

**Reference to Application:** N/A

**Comment:**

Sabina is required to comply with the Marine Transportation Security Regulations (MTSR's) as soon as a vessel, captured in the MTSR PART 2, conducts an interface with their site, by having security procedures completed to address security requirements, as stipulated in MTSR, section 315, and 355 - 358, for their site. Transport Canada will review the security procedures, prior to any Part 2 vessels interfacing with their site, for any gaps or vulnerabilities that may be outstanding. After incorporation of requirements, TC will provide a Letter of Compliance to operator, which will be valid for a five year period. Transport Canada may conduct an Intermediate Inspection in the 3rd year of the letter's applicability and additionally, as required. The Canadian Safety of Life at Sea (SOLAS) and non-SOLAS vessels that interface with the site, require a security assessment and a security plan approved by TC if conducting international voyages.

**Sabina Response:**

Sabina commits to comply with the Marine Transportation Security Regulations.

<b>Interested Party:</b>	Transport Canada	<b>No.:</b>	<b>9</b>
<b>Subject:</b>	Appendix B		

**Reference to Application:** N/A

**Comment:**

If Sabina intends to offer for transport or import dangerous goods that require an Emergency Response Assistance Plan (ERAP) under Section 7 of the Transportation of Dangerous Goods Act, 1992 (e.g. certain explosives, propane in 3000 L or greater size tanks), Sabina would have to submit a plan to TC for review. Also, the air transportation of dangerous goods must comply with Part 12 of the TDG Regulations.

**Sabina Response:**

Sabina commits to comply with the Transportation of Dangerous Goods Act.

<b>Interested Party:</b>	Transport Canada	<b>No.:</b>	10
<b>Subject:</b>	Appendix B		

**Reference to Application:** N/A

**Comment:**

The Canada Flight Supplement (CFS) lists the Sabina Gold and Silver Corp - Goose Lake NU aerodrome with two ice runways (open January - April) and a 2999 ft gravel strip indicated as Runway 14R/32L, which is already a permanent runway. As Sabina proposes to undertake the runway extension to Transport Canada TP 312 standards, this runway will remain permanent and Sabina will be required to provide TC with a notice that includes the new runway threshold co-ordinates and an aerial picture for update in the CFS.

**Sabina Response:**

Sabina commits providing the new runway threshold coordinates and an aerial picture once construction is complete.