



NWB Tools

Richard Dwyer <richard.dwyer@nwb-oen.ca>

Update Request

Merle Keefe <mkeefe@sabinagoldsilver.com>

Wed, Jun 27, 2018 at 6:20 PM

To: Dave Baines <dave.baines@nwb-oen.ca>, Matthew Pickard <mpickard@sabinagoldsilver.com>, Richard Dwyer <richard.dwyer@nwb-oen.ca>

Hi Dave,

Please see my summary below and the attached ICRP, Road MP, and Spill MP in relation to the 2BC-BRP1819 licence requirements. I've taken the opportunity to update the Spill MP to reflect June, 2018 MLA infrastructure and layout.

PART E: CONDITIONS APPLYING TO CONSTRUCTION OPERATIONS

2. The Licensee shall, within thirty (30) days of issuance of the Licence, submit an Addendum to the Plan referred to in Part E, Item 1, addressing the following issue:

a. Inclusion of a discussion of possible actions that might be taken should an inspection identify a culvert or stream crossing that is impeding spring freshet due to snow or ice (i.e., aufreis).

To address this 2BC-BRP1819 term and condition, Sabina added additional text to Section 6.1.2 "Watercourse Crossings Inspection and Maintenance" of the attached Road Management Plan (180413 8BC-BRP----D1RoadMgmtPlan-IMLE_Version2.0) to address. The additional text reads as follows:

Routine spring snow management will include the safe removal of any snow and ice that accumulates at both end of the culverts so that water at freshet can move freely through the culverts and waterway. Proper technique will be used to ensure that no ground disturbance if limited during snow and ice removal. Culverts and stream crossings will be inspected just prior to and during the spring freshet to ensure that the culverts and stream crossings are sufficiently clear to accommodate the rapid spring thaw and that action will be initiated (including removing accumulated ice) where required. Prior to Freshet, water crossings will have snow removed from ice surface on the up and downstream side of the crossing to allow free flow of water. Where culvert ice blockage is identified during inspection and if watercourse crossings can't accommodate the spring freshet, culvert thawing (steaming) will be considered as a maintenance measure.

PART H: CONDITIONS APPLYING TO SPILL CONTINGENCY PLANNING

2. The Licensee shall within thirty (30) days of issuance of this Licence, submit an Addendum to the Plan referred to in Part H, Item 1, in the format set out by the Consolidation of Spill Contingency Planning and Reporting Regulations R-068-93 addressing the following issues:

- a. Inclusion of a map for each operating site, at an adequate scale (e.g. 1:50,000) that shows topography, grade, flow direction of nearby water bodies, potential spills etc., spill kit locations; (Appendix D maps; text added to Section 5.2, Table 1)
- b. Inclusion of a commitment to post, at every operating site, the map from Part H, Item 2a for that site; (text added to Section 5.1)
- c. Revise notification procedures to ensure:
 - i. consistent terminology and (text revised throughout)
 - ii. a robust easy to implement notification process (e.g. addition of site placards or a 24 hr contact number) (Appendix B revised, these simplified procedures are to be placed around site as notification placards)
- d. Inclusion of a commitment to communicate with the KIA in the event of a spill and inclusion of the KIA in the emergency contact list; (text added to Section 3.7 and Appendix A (emergency contact list))
- e. Inclusion of a typical or maximum anticipated inventory of chemicals/products for all sites covered by the plan; and (text added to Section 2.1, 2.4)

To address this 2BC-BRP1819 term and condition, Sabina revised multiple sections throughout the attached Comprehensive Spill Contingency Plan (180627 8BC-BRP----D4ComprehensiveSpillContingencyPlan-IMLE). Please see the individual comments above.

PART I: CONDITIONS APPLYING TO CLOSURE AND RECLAMATION OR TEMPORARY CLOSURE

2. The Licensee shall, within thirty (30) days of issuance of this Licence, submit an Addendum to the Plan referred to in Part I, Item 1, to address the following:

- a. Inclusion of a commitment to post closure reporting, and a discussion of plans for post closure documentation (e.g. photographs, inspections, etc.).

To address this 2BC-BRP1819 term and condition, Sabina added Section 5.1 "Post-Closure Monitoring, Maintenance, and Reporting" to the attached Interim Closure and Reclamation Plan (180413 8BC-BRP----D5InterimCRP-IMLE_Version2.0).

Regards,

Merle

From: Dave Baines [mailto:dave.baines@nwb-oen.ca]

Sent: Tuesday, June 26, 2018 3:05 PM

To: Merle Keefe <mkeefe@sabinagoldsilver.com>; Matthew Pickard <mpickard@sabinagoldsilver.com>; Richard Dwyer <richard.dwyer@nwb-oen.ca>

Subject: Update Request

Merle/Matthew,

I distinctly remember reviewing an updated Road Management Plan, Interim C&R Plan, SCP, and Road Management plan for 2BC-BRP1819. However, I cant find any records of that review or those files.

Was I imagining that you sent us the required addendum by April 13, 2018 as per the Licence requirements?

Do you have records of them?

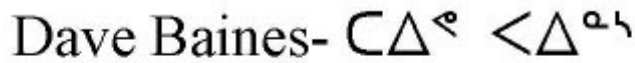
Dave

Dave Baines MSc EP

Technical Advisor

Nunavut Water Board

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 Merci de penser à l'environnement avant d'imprimer ce courriel / Thank you for thinking of the environment before printing this email

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