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**To:** [sjoseph@nunavutwaterboard.org](mailto:sjoseph@nunavutwaterboard.org)  
**Cc:** [Phyllis Beaulieu](#); [John Laitin](#); [Matthew Pickard](#)  
**Subject:** clarification for 2BEGEO1015 amendment application  
**Date:** Monday, January 09, 2012 3:26:44 PM  
**Attachments:** [Current Sabina NWBLicence Boundaries Jan2012.pdf](#)  
[Proposed Sabina NWBLicence Boundaries Jan2012.pdf](#)

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Hello Sean,

Thank you for contacting John Laitin and myself to request clarification of issues related to the amendment request for the George water license. To followup on our conversation on Friday (Jan 6) and to help understand the rationale for the amendments being requested I have attached 2 maps - the first shows the current project area boundaries for the water licenses issued to Sabina and the second shows the proposed boundaries of the George water license and the Wishbone-Malley application with the unchanged Goose water license project boundary. Note that the orange and pink shaded areas on the maps are mineral tenure held by Sabina.

There are various reasons for the amendments requested to George license, but all stem from the 2012 exploration program not just at George but at Goose and Wishbone. Planning for 2012 started in early November and very quickly Sabina realized that the level of exploration, development and monitoring work anticipated for Goose would maximize occupancy of this camp and it would not be able to support exploration at other areas. At the same time, anticipated and possible exploration and monitoring activities for George, Wishbone and Bathurst Inlet areas were identified and it was realized that the George camp would be needed to support exploration activities. Sabina has been actively working with the KIA to amend the current land use permits to reflect these changes to the existing camps. Further, water license and land use applications (AANDC and KIA) have been submitted for exploration activities in the Malley-Wishbone Trend as well. Sabina is not planning to setup a series of camps in the area, however, as Sabina implements the 2012 exploration program in the Wishbone-Malley area, safety and environmental reasons may dictate that we need to have a camp in this area and we need to ensure that the appropriate permits are in place to allow.

Sabina is committed to operating its projects that ensures personnel safety, minimizes our impact and footprint to the local environment, and is fiscally responsible. Exploration and development activities are dependent on drilling and fieldwork, but also helicopter and equipment availability, contractor needs and availability, baseline and compliance monitoring, and seasonal considerations. As Sabina moves toward finalizing its programs for 2012 (and beyond) permits need to allow flexibility to accommodate changing programs and logistical considerations. For this reason, the George amendment requests an increase to allow additional drilling, a larger camp and more comprehensive water use/waste discharge identification. The project area amendment is so that the George camp may also support exploration and baseline programs along the Wishbone Trend to the southwest, in the area of Bathurst Inlet and the Boot and Boulder properties to the southeast (just north of Goose).

Sabina recognizes that this amendment to the project boundary does result in an overlap with the other license and license application in the area. Part of this is due to the NW-SE trend of the mineral tenure and ensuring that the connecting winter corridors and temporary camp locations are included in the NWB license project areas. Overlapping permits means that exploration programs can be accommodated at either George or Goose camps which provides flexibility for logistics and seasonal consideration not just for this year, but for Sabina's future programs as well. Otherwise, we end up with a series of amendment requests that are difficult to get into place in the timeframe needed to support exploration planning and implementation.

If the overlapping permits are approved, a possible solution may be that under the current terms and conditions, Sabina is required to provide notice prior to start of operations. This letter will be prepared in the next couple of weeks for the 2012 program. Maybe within this notice, Sabina can clarify what exploration activities will be occurring on what properties and what camp will be used to support the program.

I also appreciate that the overlapping project areas may be interpreted as a way of increasing water usage while staying below the Type A trigger. Sabina actively monitors water use and waste at its projects and works to improve efficiencies on an on-going basis; some of which is included in the NWB

annual reports. Sabina is proud of its continued compliance with the current licenses and permits and we do not intend to change the commitment to meet regulatory requirements.

I hope this assists with your review of the application package and if further information is needed, please contact me or John.

Elizabeth

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