



WATER LICENCE INSPECTION FORM

☒ Original

☐ Follow-Up Report

Licensee Sabina Gold and Silver	Licensee Representative Cheryl Wray, Merle Keefe
Licence No. / Expiry 2BE-GOO1015	Representative's Title Environmental Superintendent
Land / Other Authorizations	Land / Other Authorizations
Date of Inspection 10/07/2014	Inspector Eva Paul
Activities Inspected ☒ Camp ☒ Drilling ☐ Mining ☐ Construction ☒ Reclamation ☒ Fuel Storage ☐ Roads/Hauling ☒ Other: Water Discharge ☒ Other: Spills	

Conditions:	A - Acceptable	C - Concern	U - Unacceptable	NA – Not Applicable	NI – Not Inspected			
Water Use	Condition	Comment	Site Conditions	Condition	Comment	Haz/Mat Management	Condition	Comment
Intake/Screen	A		Water Management Structures	A		Storage	A	
Flow Measure. Device	A	1	Culverts / Bridges	NA		Spills	A	4
Source: Goose Lake	A		Drainage	A		Spill Plan	A	
Water Use:	A	1	Erosion / Sediment	A				
Recirculation (y /n)	A	1	Mitigation Measures	A		Administrative		
			Reclamation Activities	A		Records	A	
			Materials Storage	A		Reports	A	
Waste Disposal			Signage	NI		Plans	A	
Waste Water	C	2				Notifications	A	
Solid Waste	A	3	Monitoring			Other		
Hazardous Waste	A		Sample Collection / Analysis	A				
*The number in the comments field will correspond with specific comments provided below.								
Samples taken by Inspector:			Location(s): Greywater 50m from discharge point; Goose Lake from the dock.					
☒ Yes ☐ No								

SECTION 1	☒ Comments (s.1)	☐ Non-Compliance with Act or Licence (s.__)	☒ Action Required (s.2)
Sabina continues to make positive changes at this project. The site is orderly and well-kept.			
1. The camp water system was upgraded to an on-demand water system in camp which is now metered at the source. Average camp use this season was around 6m³ and drill use was around 45m³/drill/day. Records are regularly being inputted into a spreadsheet. While the drills are re-circulating within the Polydrill system, Sabina has not yet implemented a closed-circuit water system for drilling. When that step is taken, a significant reduction in water use will be realized. At this point though, Sabina is well within the licence parameters. 2. A new greywater line was installed from the north dry. The discharge is into the same wetland system as the kitchen greywater. My concerns with respect to the greywater are two-fold. Firstly, the licence speaks to discharge to a sump; ‘sump’ being defined as “an excavation in impermeable soil for the purpose of catching or storing water or waste”. This definition is impractical for an active camp in poorly drained soils. The NWB has recently worked with AANDC to better define a sump in practical terms, and the definition should be updated in the renewal licence. However, Sabina is in actuality discharging to a wetland, which is an excellent system for waste water treatment, but does not meet either definition of ‘sump’. As such, if Sabina wishes to continue with the greywater system in place, Sabina should request in the licence renewal that terms be set for wetland discharge of greywater. My second concern is with respect to discharge parameters. The licence does not set discharge parameters for greywater, however, it appears that the discharges are nutrient rich, causing algal blooms. Sabina should investigate the use of environmentally-appropriate soaps and cleaning products if the water is to be discharged directly to the environment. 3. Excellent waste management practices are shown here on site. Waste is well segregated, well labelled, and is appropriately prioritized for backhaul. 4. Spill 12-056 will be closed with the Spill Line as a result of this inspection. Final reclamation of the Umwelt spill (12-283) is required before it can be closed. Further follow-up on reported spills is required until the spills are closed; but in general Sabina’s internal spill reporting records are excellent. Spill 12-278 will be inspected at my next opportunity.			
SECTION 2	☐ Comments (s.__)	☐ Non-Compliance with Act or Licence (s.__)	☒ Action Required (s.__)
As described above, please pursue clarification regarding greywater disposal through the licence renewal process. Changes to cleaning products should be considered as soon as practicable. Spill cleanups and remediation should be completed in a timely fashion so as not to be forgotten.			



Licensee or Representative <i>Cheryl Wray</i>	Inspector's Name Eva Paul
Signature <i>Cheryl Wray</i>	Signature <i>[Signature]</i>
Date <i>July 12/14.</i>	Date 12/07/2014

Office Use Only:	Follow-up report to be issued by Inspector	☐ Yes ☐ No
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☐ Follow-Up Report

Licensee Sabina Gold and Silver	Licensee Representative Cheryl Wray, Merle Keefe
Licence No. / Expiry 2BE-GEO1015	Representative's Title Environmental Superintendent
Land / Other Authorizations	Land / Other Authorizations
Date of Inspection 11/07/2014	Inspector Eva Paul
Activities Inspected ☒ Camp ☐ Drilling ☐ Mining ☐ Construction ☒ Reclamation ☒ Fuel Storage ☐ Roads/Hauling ☐ Other: Water Discharge ☒ Other: Spills	

Conditions:		A - Acceptable	C - Concern	U - Unacceptable	NA – Not Applicable	NI – Not Inspected		
Water Use	Condition	Comment	Site Conditions	Condition	Comment	Haz/Mat Management	Condition	Comment
Intake/Screen	NA		Water Management Structures	A		Storage	A	
Flow Measure. Device	NA		Culverts / Bridges	NA		Spills	A	3
Source: George Lake	A		Drainage	A		Spill Plan	A	
Water Use:	NA		Erosion / Sediment	C				
Recirculation (y / n)	NA		Mitigation Measures	A		Administrative		
			Reclamation Activities	A		Records	A	
			Materials Storage	A		Reports	A	
Waste Disposal			Signage	NI		Plans	A	
Waste Water	A	1				Notifications	A	
Solid Waste	A	2	Monitoring			Other		
Hazardous Waste	A		Sample Collection / Analysis	NA		Core Stacks	U	
<i>*The number in the comments field will correspond with specific comments provided below.</i>								
Samples taken by Inspector:			Location(s): George Lake at the water intake.					
☒ Yes ☐ No								

SECTION 1	☒ Comments (s.1)	☒ Non-Compliance with Act or Licence (s.2)	☒ Action Required (s.3)
George Camp is not currently open, nor is drilling occurring under this licence.			
- The greywater line at George was improved since 2013. A small berm has been put in place to mitigate the impact of greywater outflow on the nearby pond. - Minimal waste is seen on-site at George. Pallets of crushed barrels are awaiting backhaul. - Spill 12-334 will be closed with the Spill Line as a result of this inspection. More information is required with respect to spill 12-204 before it can be inspected. Sabina is to determine the actual coordinates of the occurrence; those listed on the spill report were in camp, however, the report indicates the spill was on a lake. - It was noted during the inspection that the old core stacks are very close to the water. The licence requires that core be stored at least 31 m from the high water mark of any water body. It was also noted, however, that operating machinery in that area resulted in rutting and gouging of the vegetation, so care will be required when undertaking this operation.			
SECTION 2	☐ Comments (s.1)	☒ Non-Compliance with Act or Licence (s.2)	☒ Action Required (s.3)
Part I item 12: The Licensee may store drill cores produced by the appurtenant undertaking in an appropriate manner and location at least thirty one (31) metres above the ordinary high water mark of any adjacent water body, where any direct flow into a water body is not possible and no additional impacts are created.			
SECTION 3	☐ Comments (s.1)	☐ Non-Compliance with Act or Licence (s.2)	☒ Action Required (s.3)
- Please provide more information on spill 12-204 as the spill file cannot be closed until an inspection has been conducted. - A plan and a timeline for moving the core is to be prepared and submitted to the Inspector by December 31, 2014.			

Licensee or Representative Cheryl Wray	Inspector's Name Eva Paul
Signature Cheryl Wray	Signature Eva Paul
Date July 12/14	Date 12/07/2014

Office Use Only:	Follow-up report to be issued by Inspector	☐ Yes ☐ No
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