Sabina
GOLD & SILVER CORP.

January 27, 2020

Richard Dwyer
Manager of Licensing
Nunavut Water Board
PO Box 119
Gjoa Haven, NU
X0B 1J0

Re: Application for Renewal of Water Licence 2BE-GEO1520

Dear Richard,

Sabina Gold & Silver Corp. (Sabina) would like to request a renewal and extension to water license 2BE-GE01520 for the George property. Sabina is requesting a renewal of the license for a further 15 years from May 30, 2020 to May 29, 2035 to allow for continued exploration in this area, concurrent with the development and operation of the Back River Project mine.

No modifications or amendments to 2BE-GEO1520 have been identified as being necessary for the purposes of this renewal.

Application Form

A completed renewal application form is included as Attachment 1. A map showing the Project location is included as Attachment 2.

Scope of Activities Proposed Under the Water Licence Renewal

This renewal does not represent a change in scope for the Project. Camp operations, population, and water use will be consistent with the exploration activities undertaken in previous years as well as with current authorizations.

Previous Land Use Planning Conformity and NIRB Screenings

As per the requirements of the Nunavut Planning and Project Assessment Act, this application was submitted to the Nunavut Planning Commission (NPC) on January 17, 2020 for a determination of whether a land use plan conformity review and whether a screening by Nunavut Impact Review Board (NIRB) is required. On January 21, 2020, the NPC issued a determination that this Project is outside the area of an applicable land use plan and that this application is exempt from screening by the NIRB (NPC File # 149278, Attachment 3).

The first Type B Water Licence for George Camp was issued in 2007. The Licence was renewed in 2010 and 2015 and has undergone previous amendments. George Camp and associated exploration activities have undergone several screenings by the NIRB. These include a screening in 2006 (see May 15, 2006 NIRB Screening Decision Report – Bolder Property – File No. 06EN033 (Attachment 4)) and consolidated screening of all Dundee Precious Metals Inc.'s holdings in the Beechy Lake area (inclusive of the Back River and Wishbone claim areas) was completed in 2008 under NIRB file 08EA084 (see reference to this on page 2 of the August 5, 2010 screening exemption decision by NIRB (Attachment 5)). NIRB also reviewed the 2015 renewal application of this Water Licence under NIRB file 08EA084 and issued a letter confirming exemption from screening on March 17, 2015 (Attachment 6).

Updated Plans

Sabina's environmental management plans for the George camp and exploration project and Water Licence have been reviewed and current plans are provided with this application as Attachments 7 and 8. They include:

Date	Plan	Notes
2018 June	Comprehensive Spill Contingency Plan	Provided to the NWB June 2018
2019 Jan	Abandonment and Restoration Plan George Camp and Exploration Project	Provided to the NWB March 2019

Updated Security Assessment

An updated liability assessment has been prepared to support this renewal application. This assessment is based on the provided Abandonment and Restoration Plan George Camp and Exploration (Jan 2019) and is included as an appendix to that plan (Attachment 8). As noted in previous correspondence, the Kitikmeot Inuit Association (KIA) holds financial security for both the Goose property and the George property, and has been doing so since 2002.

Updated Financial Statement

Sabina's most recent financial statements can be found on it's website at http://www.sabinagoldsilver.com/investors/financial-reports. 2019 third quarter interim financial results indicated that the company had cash and cash equivalents $21.9 million at September 30, 2019. More information is available at: http://www.sabinagoldsilver.com/assets/docs/fs/2019-Q2-FS-SBB.pdf

Compliance Assessment / Status Reports

The Water Resources Inspector routinely conducts inspections under this water licence and these inspections can be found on the NWB public registry. There are no outstanding issues of non-compliance in relation to this Water Licence.

English and Inuktitut Summaries of Renewal Application

Plain language summaries of the activities contemplated under the renewal are included as Attachment 9.

Application Fee and Water Use Deposit

The renewal application form requires submission of a $30 application fee plus a water use fee deposit of $30. A cheque for $60.00 addressed to the Receiver General for Canada has been forwarded to the Nunavut Water Board office in Gjoa Haven.

Closure

Should you have any questions or concerns or require additional information, please do not hesitate to contact me.

Regards,

Merle Keefe
Manager, Environmental Permitting
Sabina Gold & Silver Corp.
#1800 – 555 Burrard Street
Vancouver, BC
V7X 1M9

Enclosed:

Attachment 1 –Application Form
Attachment 2 - Project Map
Attachment 3 – January 21, 2010 NPC Conformity Determination (NPC File # 149278)
Attachment 4 - May 15, 2006 NIRB Screening Decision Report (File No. 06EN033)
Attachment 5 - August 5, 2010 NIRB letter Re: Exemption from Screening (File No. 08EA084)
Attachment 6 – April 17, 2015 NIRB Exemption from Screening Determination (File No. 08EA084)
Attachment 7 - Comprehensive Spill Contingency Plan
Attachment 8 - Abandonment and Restoration Plan George Camp and Exploration Project
Attachment 9 - Plain Language Summaries
Attachment 10 – Table of Leases and Authorizations
Attachment 11 – Certificate of Amendment of Registration
Attachment 12 – Engagement Record

ATTACHMENT 1 – APPLICATION FORM

ATTACHMENT 1

Application for Water Licence Renewal

Document Date: April 2013

Application Submission Date:
___10/08/2019_____

Month/Day/Year

P.O. BOX 119
GJOA HAVEN, NUNAVUT
XOB 1J0
TEL: (867) 360-6338
FAX: (867) 360-6369

kNK5 wmoEp5 vtmpq
NUNAVUT IMALIRIYIN KATIMAYIT
NUNAVUT WATER BOARD
OFFICE DES EAUX DU NUNAVUT

DOCUMENT MANAGEMENT

Original Document Date: April 2010

DOCUMENT AMENDMENTS

	Description	Date
(1)	Updated for public distribution as separate document from NWB Guide 7	June 2010
(2)	Updated NWB logos and reformatted table to allow rows to break across page	May 2011
(3)	New NWB logo and request for background information	April 2013
(4)		
(5)		
(6)		
(7)		
(8)		
(9)		
(10)		

P.O. BOX 119
GJOA HAVEN, NU X0B 1J0
TEL: (867) 360-6338
FAX: (867) 360-6369

kNK5 wmoEp5 vtmp5
NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYIT
OFFICE DES EAUX DU NUNAVUT

APPLICATION FOR WATER LICENCE RENEWAL

Your application may be classified as a **renewal** only if all operations remain the same as previously licensed and only the term of the licence requires change. If your application contemplates:

- a change to the volume of water authorized for use;
- a new activity related to water use or waste disposal;
- a new component related to water use or waste disposal;
- a change in predicted environmental impacts(s); and/or
- a change to any term or condition of the original licence

your application is **NOT** classified as a renewal but rather an amendment and will require submission of an Application for Water Licence Amendment. Licensees applying for combined renewal / amendment are also referred to the Application for Water Licence Amendment.

The applicant is referred to the NWB's Guide 7: *Licensee Requirements Following the Issuance of a Water Licence* for more information about this application form.

Where possible, provide background information regarding the original licence application or attach previously submitted information.

EXISTING LICENCE NO: ____2BE-GEO1520_____

1. LICENSEE CONTACT INFORMATION

Is the licensee the same as that referred to on the existing licence?

✔ Yes ☐ No

If No, a licence assignment must be completed and approved by the NWB. **A renewal will only be issued in the name of the current licensee in the absence of assignment of the licence.**

If the licensee is the same, but the name of the licensee has changed, attach a certificate of name change.

Name: *Sabina Gold & Silver Corp.*

Address: *#1800 – 555 Burrard Street Box 220, Vancouver, BC V7X 1M9*

Phone: __604-998-4175_____
Fax: ___604-998-1051_____
e-mail: _mkeefe@sabinagoldsilver.com__

2. LICENSEE REPRESENTATIVE CONTACT INFORMATION – If different from Block 1.

Name:

Address:

Phone: _____
Fax: _____
e-mail: _____

(Attach authorization letter.)

3. NAME OF PROJECT

Is the name of the project the same as that considered in the existing water licence?

✔ Yes ☐ No

Indicate the name of the project including the name of the location: _Goose Lake, Back River Project____

4. LOCATION OF UNDERTAKING

Is the location of the undertaking the same as that considered in the existing water licence?

✔ Yes ☐ No

Project Extents

Latitude: (65 ° 47 ' 00" N)	*Longitude: (107 ° 07' 00" W)*
Latitude: (65 ° 47 ' 00" N)	*Longitude: (107 ° 53' 00" W)*
Latitude: (66 ° 45 ' 30 » N)	*Longitude: (107 ° 07' 00" W)*
Latitude: (66 ° 45 ' 30 » N)	*Longitude: (107 ° 53' 00" W)*

Camp Location(s) –

Latitude: 65° 55' 13" N Longitude: 107° 27' 35" W (George Camp);
Latitude: 65° 50' 52" N Longitude: 107° 21' 06" W (Split Temporary Camp);
Latitude: 66° 31' 47" N Longitude: 107° 31' 40" W (Bathurst Inlet Temporary Camp).

In addition to other temporary drill-support camps in areas more than 20 km from George Camp. Possible location include those identified in Amendment application 2 to 2BE-GEO1015 filed on May 17, 2013.

5. MAP

Are the locations of the main components of the undertaking the same as those considered in the existing licence?

✔ Yes ☐ No

Attach a topographical map, indicating the main components of the undertaking.
See Figure 1 – Location of Project and Mineral Claims (Attachment 2)

NTS Map Sheet No.: _portions or 76B, 76C, 76F, 76G, 76J, 76K_ Map Name: __Claims Leases and Prospector Permits___Map Scale: _1:250,000___

6. NATURE OF INTEREST IN THE LAND

Is the nature of the interest in the land the same as that considered in the existing water licence?

✔ Yes ☐ No

Check any of the following that are applicable to the proposed undertaking (at least one box under the 'Surface' header must be checked).

Sub-surface

☐ Mineral Lease from Nunavut Tunngavik Incorporated (NTI)
Date (expected date) of issuance: _____ Date of expiry: _____

✔ Mineral Lease from Indian and Northern Affairs Canada (INAC)
Date (expected date) of issuance: _____ Date of expiry: _____

Surface

✔ Crown Land Use Authorization from Indian and Northern Affairs Canada (INAC)
Date (expected date) of issuance: _____ Date of expiry: _____

✔ Inuit Owned Land (IOL) Authorization from Kitikmeot Inuit Association (KIA)
Date (expected date) of issuance: _____ Date of expiry: _____

☐ IOL Authorization from Kivalliq Inuit Association (KivIA)
Date (expected date) of issuance: _____ Date of expiry: _____

☐ IOL Authorization from Qikiqtani Inuit Association (QIA)
Date (expected date) of issuance: _____ Date of expiry: _____

☐ Commissioner's Land Use Authorization
Date (expected date) of issuance: _____ Date of expiry: _____

☐ Other _____

Date (expected date) of issuance: _____ Date of expiry: _____

Sabina holds a number of mineral leases and land use authorizations associated with this Water Licence. These are provided in Attachment 10.

Is the name of the entity(s) holding authorizations the same as that considered in the existing water licence?

✔ Yes ☐ No

If No, a licence assignment must be completed and approved by the NWB.

Name of entity(s) holding authorizations: *Sabina Gold & Silver Corp.*

7. NUNAVUT PLANNING COMMISSION (NPC) DETERMINATION

Is the undertaking located in the same land use planning area as that considered in the existing licence?

✔ Yes ☐ No

Indicate the land use planning area in which the project is located.

☐ North Baffin	☐ Keewatin
☐ South Baffin	☐ Sanikiluaq
☐ Akunniq	✔ West Kitikmeot

Was a land use plan conformity determination required from NPC prior to the issuance of the existing water licence?

✔ Yes ☐ No

If Yes, indicate date issued and attach copy. ___*May 22, 2015*_____

Does the proposed renewal change the original NPC conformity determination or the need to obtain one?

✔ Yes ☐ No

If Yes, indicate date issued (or expected) and attach a copy. _*January 21, 2020 (attachment 3)*

If No, provide written confirmation from NPC confirming that a land use plan conformity review is not required.

8. NUNAVUT IMPACT REVIEW BOARD (NIRB) DETERMINATION

Was a screening determination required from NIRB prior to the issuance of the existing water licence?

☐ Yes ✔ No

If Yes, indicate date issued and attach copy. _*NIRB issued a determination that the application was exempt from Screening pursuant to Section 12.4.3 of the NLCA on April 17, 2015 (Attachment 4).*

Does the proposed renewal change the original NIRB screening determination or the need to obtain one?

☐ Yes ✔ No

If Yes, indicate date issued (or expected) and attach a copy. _____
If No, provide written confirmation from NIRB confirming that a screening determination is not required. *This application was provided to the NPC to make a determination on whether a screening is required by the NIRB. This determination was issued January 21, 2020 (Attachment 3) and indicated that no NIRB screening is required.*

9. DESCRIPTION OF UNDERTAKING

Is the description of the undertaking the same as that considered in the existing water licence?

☑ Yes ☐ No

List and attach plans and drawings or project proposal.

See the non-technical summary (Attachment 9) as well as the environmental management plans provided in Attachments 7 and 8. No changes to the undertakings are proposed.

10. OPTIONS

Are the alternative methods and locations that were considered to carry out the project the same as those considered in the existing water licence?

☑ Yes ☐ No

Provide a brief explanation of the alternative methods or locations that were considered to carry out the project.
Over the life of this water licence, this Project has undergone multiple optimizations and subsequent Water Licence amendments. At this time, no further no changes to this already-established Project have been identified.

11. CLASSIFICATION OF PRIMARY UNDERTAKING

Is the primary undertaking the same as that considered in the existing water licence?

☑ Yes ☐ No

Indicate the primary classification of undertaking by checking one of the following boxes.

☐ Industrial
☐ Agricultural
☑ Mining and Milling (includes exploration/drilling/exploration camps)
☐ Conservation
☐ Municipal (includes camps/lodges)
☐ Recreational
☐ Power
☐ Miscellaneous (describe below):

_____

See Schedule II of the *Northwest Territories Waters Regulations* for Description of Undertakings.

12. WATER USE

Is the type(s) of water use(s) the same as that considered in the existing water licence?

☑ Yes ☐ No

Check the appropriate box(s) to indicate the type(s) of water use(s) being applied for.

- ☑ To obtain water for camp/ municipal purposes
- ☑ To obtain water for industrial purposes
- ☐ To cross a watercourse
- ☑ To alter the flow of, or store water
- ☐ Other: _____
- ☐ To divert a watercourse
- ☐ To modify the bed or bank of a watercourse
- ☐ Flood control

13. QUANTITY OF WATER INVOLVED

Is the source of water the same as that considered in the existing licence? ✔ Yes ☐ No

Name of water source(s): __*George Lake and/or lakes proximal to temporary camps and drilling targets*__
(show location(s) on map)

Is the quality of the water source and its available capacity the same as that considered in the existing licence?
✔ Yes ☐ No

Describe the quality of the water source(s) and the available capacity(s): _*The quality of water for potable uses from George Lake is suitable for drinking following disinfection.*

Is the overall estimated quantity of water to be used the same as that considered in the existing licence?
✔ Yes ☐ No

Provide the overall estimated quantity of water to be used: *175* m^3/day

Are the quantity(s) of water to be used from each source the same as those considered in the existing licence?
✔ Yes ☐ No

Provide the estimated quantity(s) of water to be used from each source: *As per Part C, Item 1 of the Water Licence, Sabina "…shall obtain all Water for domestic camp use from George Lake and/or lakes proximal to temporary camps. Total camp Water use shall not exceed forty-five (45) cubic metres per day. Drill water shall be obtained from George Lake and/or Water source(s) proximal to the drilling targets as outlined in the Application, and shall not exceed one hundred and thirty (130) cubic metres per day. The volume of Water used for the purposes of this Licence shall not exceed one hundred and seventy-five (175) cubic metres per day."*

Are the quantity(s) of water to be used for each purpose the same as those considered in the existing licence?
✔ Yes ☐ No

Provide the estimated quantities to be used for each purpose (camp, drilling, etc.): _*Domestic Use: 45 m3/day; Industrial Use: 130 m3/d. Industrial use includes but is not limited to drilling, dust suppression, storage, discharge, diversion/collection, winter road building, and ice airstrip building.*

Are the method(s) of extraction the same as those considered in the existing licence? ✔ Yes ☐ No

Describe the method(s) of extraction: *same as existing licence; intakes equipped with fish screens meeting the DFO water intake guidelines*__

Are the quantity(s) of water returned to source(s) the same as those considered in the existing licence?
✔ Yes ☐ No

Estimated quantity(s) of water returned to source(s): __up to 130_ m^3/day

Are the quality(s) of water(s) returned to source(s) the same as those considered in the existing licence?
☐ N/A ✔ Yes ☐ No

Describe the quality(s) of water(s) returned to source(s):__Drill return water is water circulated through the drill continuously but not used in the drilling process itself. This water may be returned to the source waterbody chemically unaltered._

_____
_

14. WASTE

Are the type(s) of waste(s) to be generated and/ or deposited the same as those considered in the existing licence?

✔ Yes ☐ No

Check the appropriate box(s) to indicate the types of waste(s) generated and deposited.

- ✔ Sewage
- ✔ Solid Waste
- ✔ Hazardous
- ✔ Bulky Items/Scrap Metal
- ☐ Animal Waste
- ☐ Other (describe):_____
- ✔ Waste oil
- ✔ Greywater
- ☐ Sludges
- ✔ Contaminated soil and/or water

15. QUANTITY AND QUALITY OF WASTE INVOLVED

Are the quantity(s) of the types of wastes involved the same as those considered in the existing licence?

✔ Yes ☐ No

Are the composition(s) of the types of wastes involved the same as those considered in the existing licence?

✔ Yes ☐ No

Are the method(s) of treatment for the types of waste involved the same as those considered in the existing licence?

✔ Yes ☐ No

Are the method(s) of disposal for the types of waste involved the same as those considered in the existing licence?

✔ Yes ☐ No

For each type of waste indicated in Block 14, describe its composition, quantity in cubic meters/day, method of treatment and method of disposal.

Type of Waste	Composition	Quantity Generated	Treatment Method	Disposal Method
Sewage	Pacto toilet waste in bags	2-3 bags/day	Incineration	Offsite
Solid Waste	Paper, plastic, wood, burlap, absorbent material, food wastes	20 bags a day	Incineration and/or Open burning (untreated wood and cardboard)	Offsite
Hazardous	Batteries, contaminated materials	Variable	Backhauled to Yellowknife	Offsite
Bulk Items/ Scrap Metal	Empty drums	Variable	Drained, crushed and strapped or shipped whole	Offsite
Waste Oil	Waste Oil	Variable	Backhauled to Yellowknife/burned in on site waste oil furnaces	Offsite
Greywater	Kitchen, bathing and laundry water	7 m3/d	Grease trap, Natural attenuation	Collection sump or discharge to wetland
Contaminated soil and/or water	Water from secondary containment, contaminated soils	Variable	Water – rain drain or alternate oil-water separation if necessary Soil - Backhauled	Water - Discharged to tundra or shipped off site Soil - offsite

16. OTHER AUTHORIZATIONS

In addition to the sub-surface and surface land use authorizations provided in Block 6, are the same authorizations required as considered in the existing licence?

✔ Yes ☐ No

For each provide the following:
Authorization: _____
Administering Agency: _____
Project Activity: _____

Date (expected date) of issuance: _____ Date of expiry: _____

A full list of authorizations associated with the George Project is provided in Attachment 10 (Leases and Authorizations).

17. PREDICTED ENVIRONMENTAL IMPACTS OF UNDERTAKING AND PROPOSED MITIGATION MEASURES

Are predicted environmental impacts of the undertaking and proposed mitigation measures the same as those considered in the existing water licence?

✔ Yes ☐ No

Describe direct, indirect, and cumulative impacts related to water and waste.

The potential environmental impacts related to the use of water and the disposal of waste from camp operation and drilling are as follows:

- *Water for the camp water supply is derived from George Lake, which has sufficient capacity*
- *Camp waste is incinerated or removed from site*
- *Greywater is discharged to a wetland with a long flow path to an unnamed lake*
- *Drills and drilling supplies are positioned using helicopters to minimize ground disturbance when the ground is unfrozen.*
- *When drilling on land, salt (calcium chloride) is added to drill water to keep the drill rods from freezing in the hole.*
- *Brine is not required for drilling on the ice into the bottom of larger lakes as these lakes are not underlain with permafrost.*
- *Water from drilling operations is recirculated to minimize the quantity of both water and salt used and to minimize runoff near the drill site.*
- *Drill cuttings are collected and subsequently deposited in a sump*
- *Drilling in lake bottoms occurs within a casing to minimize sedimentation.*
- *At each drill site (except those drilled from ice) drillholes are backfilled with cuttings and cement or bentonite.*

Cumulative impacts of drilling are minimized because of the above mitigation measures, as well as progressive reclamation (backfilling) of drill holes. Sabina notes that past inspection reports by the CIRNAC Water Resources Inspector have commended Sabina on the handling of wastes and drill hole reclamation.

18. WATER RIGHTS OF EXISTING AND OTHER WATER USERS

Are the effects of the undertaking on any known persons or property including those that hold licences for water use in precedence to the application, domestic users, in-stream users, authorized waste depositors, owners of property, occupiers of property, and/or holders of outfitting concessions, registered trapline holders, and holders of other rights of a similar nature, the same as those considered in the existing water licence?

☑ Yes ☐ No

Provide the names, addresses and nature of use for any known persons or properties that may be adversely affected by the proposed undertaking, including those that hold licences for water use in precedent to the application, domestic users, in-stream users, authorized waste depositors, owners of property, occupiers of property, and/or holders of outfitting concessions, registered trapline holders, and holders of other rights of a similar nature.

Advise the Board if compensation has been paid and/or agreement(s) for compensation have been reached with any existing or other users.

Sabina has reached an agreement for compensation for water use with the Kitikmeot Inuit Association.

19. INUIT WATER RIGHTS

Are the effects of the undertaking on the quality, quantity or flow of waters flowing through Inuit Owned Land (IOL) the same as those considered in the existing water licence?

☑ Yes ☐ No

Advise the Board of any substantial affect of the quality, quantity or flow of waters flowing through Inuit Owned Land (IOL), and advise the Board if negotiations have commenced or an agreement to pay compensation for any loss or damage has been reached with one or more Designated Inuit Organization (DIO).

No substantial effects to the quality, quantity or flow of waters through IOL is expected to occur from water use and waste disposal contemplated in this licence renewal. Sabina has reached an agreement for compensation for water use with the Kitikmeot Inuit Association.

20. CONSULTATION - Provide a summary of any consultation meetings including when the meetings were held, where and with whom. Include a list of concerns expressed and measures to address concerns.

No consultation meetings were held in conjunction with this request. However, Sabina has carried out extensive consultation with nearby communities regarding it's Back River Project, as documented in Attachment 12.

21. SECURITY INFORMATION

Is the financial security assessment the same as that considered in the existing water licence?

☐ Yes ✔ No

Is the estimate of the total financial security for final reclamation the same as that considered in the existing water licence?

☐ Yes ✔ No

Provide an estimate of the total financial security for final reclamation equal to the total outstanding reclamation liability for land and water combined sufficient to cover the highest liability over the life of the undertaking. Estimates of reclamation costs must be based on the cost of having the necessary reclamation work done by a third party contractor if the operator defaults. The estimate must also include contingency factors appropriate to the particular work to be undertaken.

Where applicable, the financial security assessment should be prepared in a manner consistent with the principals respecting mine site reclamation and implementation found in the *Mine Site Reclamation Policy for Nunavut,* Indian and Northern Affairs Canada, 2002.

An updated liability assessment for the George camp is provided in the updated Abandonment and Restoration Plan submitted as Attachment 8.

22. FINANCIAL INFORMATION

Is the statement of financial security the same as that considered in the existing water licence?

✔ Yes ☐ No

Provide an updated statement of financial security.

Sabina's most recent financial statements can be found on it's website at http://www.sabinagoldsilver.com/investors/financial-reports. 2019 second quarter interim financial results indicated that the company had cash and cash equivalents $21.9 million at June 30, 2019. More information is available at: http://www.sabinagoldsilver.com/assets/docs/fs/2019-Q2-FS-SBB.pdf

If the applicant is a business entity please answer the questions below:

Is the list of the officers of the company the same as those considered in the existing water licence?

☐ Yes ✔ No

Provide a list of the officers of the company.

Bruce McLeod. President/CEO
Elaine Bennett. Vice-President. Finance & CFO
Nicole Hoeller. Vice-President. Communications & Corporate Secretary
Lello Galassi. Vice-President. Project Development and Construction
Angus Campbell. Vice-President. Exploration
Matthew Pickard. Vice-President, Environment & Sustainability

Is the Certificate of Incorporation or evidence of registration of the company name the same

✔ Yes ☐ No

Attach a copy of the Certificate of Incorporation or evidence of registration of the company name.

See Attachment 11.

23. STUDIES UNDERTAKEN TO DATE

List and attach updated studies, reports, research etc.

Provide a compliance assessment and status report including a response to any inspector's reports. The licensee must contact the NWB for licence specific direction in completing the assessment and report.

If in non-compliance, a licence may not be issued until compliance is achieved. If in non-compliance, attach plans/reports for consideration. Application will not be processed if significant issues of non-compliance exist.

Sabina has conducted extensive studies related to the Back River Project. A comprehensive compilation of these studies can be found in Sabina's Back River Project EIS, available on the NIRB public registry and Sabina's Type A Water Licence Application, available on the NWB public registry. Monitoring under the 2BE-GEO1520 Water Licence is presented in the 2018 Annual Report (March 2019).

The Water Resources Inspector routinely conducts inspections under this water licence. Inspector reports can be found on the NWB public registry at ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2B/2BE%20-%20Exploration/2BE-GEO1520%20Sabina/3%20TECH/0%20SCOPE%20ENFORCE%20(A)/1%20INSPECTION/ Any issues raised during these inspections were addressed as identified. There are no outstanding non-compliances for 2BE-GEO1520.

24. PROPOSED TIME SCHEDULE

Is the time schedule for all phases of development (construction, operations, closure and post closure) the same as that considered in the existing licence?

☐ Yes ✔ No

Indicate the proposed start and completion dates for each applicable phase of development (construction, operation, closure, and post closure).

Construction
Proposed Start Date: *Already Constructed* (month/year) Proposed Completion Date:_____ (month/year)

Operation
Proposed Start Date: *May 30, 2020* (month/year) Proposed Completion Date: *May 29, 2035* (month/year)

Closure
Proposed Start Date:_____ (month/year) Proposed Completion Date:_____ (month/year)

Closure is not currently planned for exploration activities. Sabina hopes to move into the mine development phase at the Back River Project and anticipates that George Project exploration will continue in parallel to mining activities; throughout the mine life and beyond.

Post - Closure
Proposed Start Date:_____ (month/year) Proposed Completion Date:_____ (month/year)

For each applicable phase of development indicate which season(s) activities occur.

Construction
☐ Winter ☐ Spring ☐ Summer ☐ Fall ☐ All season

Operation
☐ Winter ☐ Spring ☐ Summer ☐ Fall ✔ All season

Closure
☐ Winter ☐ Spring ☐ Summer ☐ Fall ☐ All season

Post - Closure
☐ Winter ☐ Spring ☐ Summer ☐ Fall ☐ All season

25. PROPOSED TERM OF LICENCE

On what date does the existing licence expire? ____May 29, 2020_____

Indicate the proposed term of the renewal (maximum of 25 years): __15 years_____

Requested date of renewal issuance: _May 30, 2020_ (month/year) Requested Expiry Date: _May 29, 2035__ (month/year)

(The requested date of renewal issuance must be at least three (3) months from the date of application for a type B water licence and at least one (1) year from the date of application for a type A water licence, to allow for processing of the water licence application. These timeframes are approximate and do not account for the time to complete any pre-licensing land use planning or development impact requirements, time for the applicant to prepare and submit a water licence application in accordance with any project specific guidelines issued by the NWB, or the time for the applicant to respond to requests for additional information. See the NWB's *Guide 5: Processing Water Licence Applications* for more information)

26. ANNUAL REPORTING

Is the annual report template expected to be the same as that considered in the existing licence?

✔ Yes ☐ No

If not using the NWB's ***Standardized Form for Annual Reporting*****,** provide details regarding the content of annual reports and a proposed outline or template of the annual report.

27. CHECKLIST

The following must be included with the application for renewal for the water licensing process to begin.

Completed Application for Water Licence Renewal form.

✔ Yes ☐ No If no, date expected _____

Updated plans, including designs and reports (see Block 23).

✔ Yes ☐ No If no, date expected _____

Updated security assessment (see Block 21).

✔ Yes ☐ No If no, date expected _____

Updated financial statement (see Block 22).

✔ Yes ☐ No If no, date expected _____

Compliance Assessment / Status Report (see Block 23).

✔ Yes ☐ No If no, date expected _____

English Summary of Renewal Application.

✔ Yes ☐ No If no, date expected _____

Inuktitut and/or Inuinnaqtun Summary of Renewal Application.

✔ Yes ☐ No If no, date expected _____

Application fee of $30.00 CDN (Payee Receiver General for Canada).

✔ Yes ☐ No If no, date expected _____

Water Use Fee Deposit of $30.00 CDN (Payee Receiver General for Canada). The actual water use fee will be calculated by the NWB based upon the amount of water authorized for use in accordance with the Regulations at the time of issuance of the licence.
A cheque for $60.00 addressed to the Receiver General for Canada has been forwarded to the Nunavut Water Board office in Gjoa Haven for payment of the Application Fee and the Water Use Deposit.

✔ Yes ☐ No If no, date expected _____

28. SIGNATURE

I, Merle Keefe (print name)

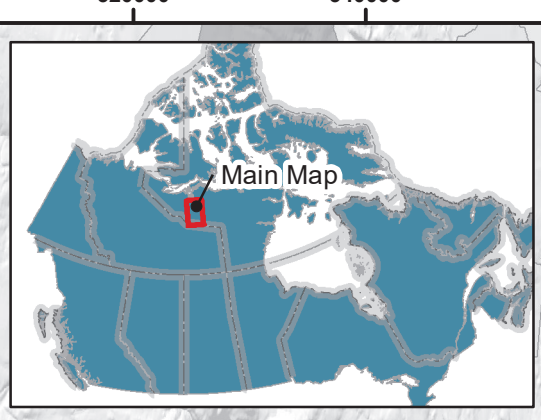
certify that the application requires no changes to water use or waste disposal as previously authorized and that the information given on this form is, to the best of my knowledge, correct and complete.

Signature

Jan. 23/20
Date

ATTACHMENT 2 - PROJECT MAP

W:\BackRiver\04_Exploration\BackRiverRegion\GIS_Products\ESRI_MXD\Permitting\BR_WL_CT_Tenements_George.mxd



Legend

- MLA
- Camp Locations
- Cat Train Route
- WIR 2019
- 2BE-GOO1520
- 2BE-GEO1520
- 2BE-MLL1722
- 2AM-BRP1831
- Lease
- Claim

Inuit Owned Land

- Surface
- Subsurface and Surface

1:650,000

NAD83 UTM Zone 13N

0 5 10 20

Kilometers

N

MLA

Arctic Circle

George

George Camp

Hackett Camp

Boulder

Boot

Goose

Goose Camp

Wishbone

Del

Malley

320000 340000 360000 380000 400000 420000 440000 460000

7430000 7400000 7370000 7340000 7310000 7280000 7250000 7220000 7190000

ATTACHMENT 3 – NPC CONFORMITY DETERMINATION (NPC FILE # 149278)

ᓄᓇᕗᑦᒥ ᐸᕐᓇᐃᔩᑦ
Nunavunmi Parnaiyiit
Nunavut Planning Commission
Commission d'Aménagement du Nunavut

January 21, 2020

NIRB - Nunavut Impact Review Board
Talia Maksagak
Manager, Technical Administration
P.O. Box 1360, Cambridge Bay, NU X0B 0C0
Manager, Technical Administration
info@nirb.ca
tmaksagak@nirb.ca

NWB - Nunavut Water Board
Richard Dwyer, Manager of Licensing
P.O. Box 119, Gjoa Haven, NU X0B 1J0
licensing@nwb-oen.ca

INAC – Indigenous & Northern Affairs Canada
Tracey McCaie
P.O. Box 100, Iqaluit, NU X0A 0H0
tracey.mccaie@aandc.gc.ca
aadnc.landsmining.aandc@canada.ca

KitIA – Kitikmeot Inuit Association
Geoff Clark, Director of Lands
Kitikmeot Inuit Association
Box 360, Kugluktuk, NU X0B 0E0
dirlands@kitia.ca

NTI – Nunavut Tunngavik Inc.
Carson Gillis
Director, Department of Lands and Resources
Box 1269 Iqaluit, NU X0H 0H0
cgillis@tunngavik.com

PROPONENT:
Matthew Pickard
Sabina Gold & Silver Corp.
Suite 1800, Two Bentall Centre, 555 Burrard Street
Vancouver BC V7X 1M7
mpickard@sabinagoldsilver.com

Dear Ms. Maksagak, Mr. Dwyer, Ms. McCaie, Mr. Clark, Mr. Gillis, Mr. Pickard:

RE: NPC File # 149278 [Renewal of Water Licence 2BE-GEO1520]

The following works and activities have been proposed in the above-noted project proposal:

1. Renewal of existing water license
2. Location: Kitikmeot Region; [Bathurst Inlet/Sabina/Back River Project]

A complete description of the project proposal reviewed by the NPC can be accessed online using the link below.

The Nunavut Planning Commission (NPC) has completed its review of the above noted project proposal. NPC has determined that this project proposal is outside the area of an applicable regional land use plan. The activities associated with this proposal were previously reviewed by NPC in 2015. In addition, the works and activities listed above were previously screened by the Nunavut Impact Review Board (NIRB FILE No. 08EA084). The above-noted project proposal is exempt from screening by the NIRB because the NPC is of the understanding that it does not change the general scope of the original project activities, and the exceptions noted in Section 12.4.3 (a) and (b) of the Nunavut Agreement do not apply.

By way of this letter, the NPC is forwarding the project proposal to the regulatory authorities identified by the proponent. Project materials are available at the following address: https://lupit.nunavut.ca/portal/project-dashboard.php?appid=149278&sessionid=

This decision applies only to the above noted project proposal as submitted. Proponents may not carry out projects and regulatory authorities may not issue licenses, permits and other authorizations in respect of projects if a review by the NPC is required.

If you have any questions, please do not hesitate to contact me at (867) 857-2242.

Sincerely,

Peter Scholz
Senior Planner,
Nunavut Planning Commission

ATTACHMENT 4 - MAY 15, 2006 NIRB SCREENING DECISION REPORT (FILE NO. 06EN033)

SCREENING DECISION REPORT
Dundee Precious Metals Inc. Boulder Property

NIRB File No.: 06EN033

May 15, 2006

Hon. Jim Prentice
Minister of Indian affairs and Northern Development
Ottawa, ON

Vía email: minister@inac.gc.ca

Dear Hon. Prentice:

Authority:

Section 12.4.4 of the Nunavut Land Claim Agreement states:

Upon receipt of a project proposal, NIRB shall screen the proposal and indicate to the Minister in writing that:

a) the proposal may be processed without a review under Part 5 or 6; NIRB may recommend specific terms and conditions to be attached to any approval, reflecting the primary objectives set out in Section 12.2.5;
b) the proposal requires review under Part 5 or 6; NIRB shall identify particular issues or concerns which should be considered in such a review;
c) the proposal is insufficiently developed to permit proper screening, and should be returned to the proponent for clarification; or
d) the potential adverse impacts of the proposal are so unacceptable that it should be modified or abandoned.

Primary Objectives:

The primary objectives of the Nunavut Land Claims Agreement are set out in section 12.2.5 of the Land Claims Agreement. This section reads:

In carrying out its functions, the primary objectives of NIRB shall be at all times to protect and promote the existing and future well-being of the residents and communities of the Nunavut Settlement Area, and to protect the ecosystemic integrity of the Nunavut Settlement Area. NIRB shall take into account the well-being of the residents of Canada outside the Nunavut Settlement Area.

The decision of the Board in this case is 12.4.4 (a) **the proposal may be processed without a review under Part 5 or 6; NIRB may recommend specific terms and conditions to be attached to any approval, reflecting the primary objectives set out in Section 12.2.5;**

Reasons for Decision:
NIRB's decision is based on specific considerations that reflect the primary objectives of the Land Claims Agreement. Our considerations in making this decision included:

- the impact of drilling activities on the ecosystem;
- disposal of drill cuttings and waste water;
- impact to water quality, aquatic habitat and wildlife and fish populations from chemicals, drill waste, drill fluids and potential fuel spills;
- storage and disposal of chemicals, fuel, garbage, sewage, and gray water, and impact of these on the ecosystem;
- the impact of noise from drilling activities and their disturbance to wildlife and traditional users of area;
- the potential impact of aircraft/helicopter on wildlife;
- the impact of campsite and equipment on terrain;
- the impact of exploration activities on archaeological sites or cultural landmarks in the area; and
- clean up/restoration of the camp site and drilling locations upon abandonment.

Terms and Conditions:
That the terms and conditions attached to this screening report will apply.

General

1. The Permittee shall maintain a copy of the Project Terms and Conditions at the sites of operation at all times.

2. The NIRB shall be notified prior to any changes in operating plans or conditions associated with this project.

3. Prior to commencing on-site activities, the Proponent shall submit to NIRB copies of all permits, licenses and authorizations required to undertake the project.

4. The Permittee shall submit to Board, at the end of the field season, a map showing the approximate location of drill sites.

5. The Permittee shall ensure that all on-site personnel, including any contractors, are familiar with these Terms and Conditions and any license or permit requirements.

6. This Permittee shall be aware they are required to register with the Government of Nunavut, Department of Environment – Environmental Protection Service regarding the movement of any hazardous wastes through a Waste Manifest.

7. The Permittee shall file a report with the Board no later than March 31 of the year following the calendar year reported, which shall contain the following information:
    a. A summary of activities undertaken for the year, including but not limited to the amount of drilling;
    b. A work plan for the following year;
    c. The results of environmental studies undertaken and plans for future studies;
    d. Wildlife encounters and actions/mitigation taken and any results from a Wildlife Monitoring/Reporting Plan;
    e. A summary of local hires and initiatives;
    f. A summary of community consultations undertaken and the results;
    g. A summary of site-visits by inspectors with results and follow-up actions;
    h. A summary of site-visits with community members;
    i. Site photos;
    j. The number of take-offs & landings from an airstrip with approved flight path with date and location;
    k. The number of helicopter touch-downs on the land with date, location and reason (provide reason unless confidential);
    l. Results of a Wildlife Monitoring/Reporting Plan;
    m. Progressive reclamation work undertaken; and
    n. A summary of how it has complied with all project Terms and Conditions.

Drill Sites

1. The Permittee shall not conduct any land based drilling within thirty (30) metres of the normal high water mark of a water body.

2. The Permittee shall ensure that all drill cuttings are removed from ice surfaces.

3. The Permittee shall ensure that drilling wastes do not enter any water body. The use of biodegradable, salt free drill additives is encouraged over non-biodegradable types.

4. The Permittee shall not use drilling muds or additives in connection with drill holes unless they are recirculated or contained such that they do not enter the water, or are certified to be non-toxic. Further, the Permittee is hereby informed that the Canadian Environmental Protection Act has recently listed CaCl as a toxic substance. If CaCl is to be used as a drill additive, the proponent shall ensure that all sumps containing CaCl are properly constructed and located in such a manner as to ensure that the contents will not enter any waterbody.

5. The Permittee shall ensure that when “on-ice drilling”, the return water released must be non-toxic, and not result in an increase in total suspended solids in the immediate receiving waters above the Canadian Council of Ministers for the Environment (CCME) Guidelines for the Protection of Freshwater Aquatic Life (ie. 10 mg/L for lakes with background levels under 100 mg/L, or 10% for those above 100 mg/L).

6. The Permittee shall ensure that any drill cuttings and waste water that cannot be re-circulated be disposed of in a properly constructed sump.

7. The Permittee shall ensure that the sump/depression capacity is sufficient to accommodate the volume of waste water and any fines produced to reduce additional impacts.

8. The Permittee shall not locate any sump within thirty (30) metres of the normal high water mark of any water body.

9. The Permittee shall ensure that disturbance of vegetation from deposit of drill fluids/cuttings is restricted to the area of the sump, and the ground prepared for revegetation upon abandonment.

10. The Permittee shall not use mechanized clearing within 30 meters of the normal high water mark of a watercourse, in order to maintain a vegetative mat for bank stabilization.

11. The Permittee shall, where flowing water from bore holes is encountered, plug the bore hole in such a manner as to permanently prevent any further outflow of water. The occurrence shall be reported to the Nunavut Water Board and Land Use Inspector within 48 hours.

Water

1. The Permittee shall ensure that all water intake hoses are equipped with a screen with an appropriate mesh size to ensure that there is no entrapment of fish.

2. The Permittee shall only use water from sources approved by the Nunavut Water Board.

Fuel and Chemical Storage

1. The Permittee shall update its Spill Contingency Plan on an annual basis. Once revised in the 2007 year, this plan must include the Government of Nunavut – Department of Environment Waste Manifest for tracking hazardous wastes, as well as updated contacts reflecting, but not limited to, the current ownership/optioning rights, and relevant Environment Canada officers.

2. The Permittee shall locate fuel caches and other hazardous materials in such a manner as to prevent their release into the environment.

3. The Permittee shall ensure that fuel storage containers are not located within thirty (30) metres of the ordinary high water mark of any body of water. Further, secondary containment such as self supporting insta-berms shall be used when storing barrel fuel on location, rather than relying on natural depressions.

4. Fuel storage containers in excess of 4,000 litres capacity shall either be double-walled, self bermed construction, or diked with adequate storage capacity. An impermeable liner shall be used to ensure that no fuel escapes. The Permittee shall take all reasonable precautions to

prevent the possibility of migration of spilled petroleum fuel or chemicals over the ground surface.

5. All fuel storage containers should be situated in a manner that allows easy access and removal of containers in the event of leaks or spills.

6. The Permittee shall examine all fuel and chemical storage containers daily for leaks. All leaks should be reported immediately.

7. The Permittee shall seal all container outlets except the outlet currently in use.

8. The Permittee shall mark all fuel containers with the Permittee's name.

9. The Permittee shall dispose of all combustible waste petroleum products by incineration and all ashes shall be removed from the site.

10. The Permittee shall ensure that all activities, including maintenance procedures and refueling, are controlled to prevent the entry of petroleum products or other deleterious substances into the water or onto the land.

11. The Permittee shall ensure that all on site personnel are properly trained in fuel and hazardous waste handling procedures as well as spill response procedures.

12. The Permittee shall immediately report **all** spills of petroleum and hazardous chemicals to the twenty-four (24) hour spill report line at (867) 920-8130. Spills shall also be reported to Environment Canada at (867) 920-5131.

13. The Permittee shall maintain a supply of spill kits, shovels, barrels, sorbents, and pumps on-site.

14. The Permittee shall use drip pans when refueling equipment and should consider having portable spill kits located at each drill site location.

15. Chemicals containing salts, which may attract wildlife to the site, should be stored so that they are inaccessible to wildlife.

Waste Disposal

1. The Permittee shall not discharge or deposit any refuse substances or other waste materials in any body of water, or on the banks thereof, which will impair the quality of the waters of the natural environment.

2. The Permittee shall not locate any sumps or areas designated for waste disposal within thirty (30) metres of the ordinary high water mark of any body of water. Sumps and areas designated for waste disposal shall be sufficiently bermed or otherwise contained to ensure that substances to do not enter a waterway unless otherwise authorized.

3. The Permittee shall use an approved incinerator for the disposal of combustible camp wastes. The Permittee shall incinerate all combustible and food wastes daily.

4. The Permittee shall keep all ash in a covered metal container until it is disposed of at an approved facility. The Permittee shall keep all non-combustible garbage and debris in a covered metal container until disposed of at an approved facility.

5. The Permittee shall deposit all scrap metal, discarded machinery and parts, barrels and kegs, at an approved disposal site.

6. The Permittee shall ensure that any hazardous materials, including waste fuel and oil, receive proper treatment and are backhauled for disposal at an approved facility.

Structure & Storage Facilities

1. The Permittee shall not erect structures or store material on the surface ice of lakes or streams.

2. The Permittee shall locate all structures and storage facilities on gravel, sand or other durable land.

Camps

1. The Permittee shall locate all camps on gravel, sand, or other durable land.

2. The Permittee shall not erect camps or store material on the surface ice of lakes or streams.

3. The Permittee shall keep the camp clean and tidy at all times so as not to attract carnivores.

Physical Environmental

1. The Permittee shall ensure that the land use area is kept clean and tidy at all times.

2. The Permittee shall prepare the site in such a manner as to prevent rutting of the ground surface.

3. The Permittee shall not do anything that will cause erosion of the banks of any body of water on or adjacent to the land and shall provide necessary controls to prevent such erosion. The Permittee shall adopt such measures as required to control erosion by surface disturbance. Sediment and erosion control measures should be implemented prior to, and maintained during the work to prevent sediment entry into the water during a spring thaw.

4. The Permittee shall be required to undertake corrective measures in the event of any damage to the land or water as a result of the Permittee's operation.

5. The Permittee shall not remove any material from below the ordinary high water mark of any waterbody.

6. The Permittee shall not move any equipment or vehicles unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging.

7. The Permittee shall suspend overland travel of equipment or vehicles if rutting occurs.

Wildlife

1. The Permittee shall ensure that there is no damage to wildlife habitat in conducting this operation.

2. The Permittee shall ensure that there is minimal disturbance to any nesting birds and wildlife in the area. Harassment of wildlife is prohibited. This includes persistently worrying or chasing animals, or disturbing large groups of animals.

3. Pursuant to the Migratory Bird Convention Act Regulations the Permittee shall not disturb or destroy the nests or eggs of migratory birds. The period from May 15 to July 31 is the general migratory bird breeding season. If nests containing eggs or young are encountered, the Permittee shall avoid these areas until nesting is complete and the young have left the nest.

4. The Permittee must be in compliance with the *Migratory Birds Convention Act* and *Migratory Birds Regulations* during all phases and in all undertakings related to the project.

5. The Permittee shall be aware that the Species at Risk Act (SARA), came into full effect on June 1, 2004. Section 79 (2) of SARA, states that during an assessment of effects of a project, the adverse effects of the project on listed wildlife species and its critical habitat must be identified, that measures are taken to avoid or lessen those effects, and that the effects need to be monitored. This section applies to all species listed on Schedule 1 of SARA, but as a matter of best practice, species listed on other Schedules of SARA and under consideration for listing should also be included in this type of assessment.

Species at Risk	Category of Concern	Schedule of SARA
Grizzly Bear	Special Concern	Pending
Wolverine (Western Population)	Special Concern	Pending
Peregrine Falcon (subspecies tundris)	Special Concern	Schedule 3
Short-eared Owl	Special Concern	Schedule 3

The Permittee should consult with the Government of Nunavut and Environment Canada to develop appropriate status reports, action plans, and management plans to minimize effects to these species from the project. The Permittee should also consider the development of appropriate monitoring for these species.

6. The Permittee shall follow procedures outlined in the "Safety in Bear Country Manual", and should contact the Regional/Area Biologist or the Wildlife manager for information and

advice on measures which should be taken to minimize the possibility of conflicts/interactions with bears or carnivores. Should the Permittee encounter carnivores, they are advised to contact the local or regional wildlife officers.

7. The Permittee shall ensure that aircraft pilots adhere to flight altitudes of greater than 610 m above ground level, unless there is a specific need for low-level-flying which does not to disturb wildlife. Concentrations of caribou and calves should be avoided by low-level aircraft at all times.

8. The Permittee shall ensure that aircraft maintain a vertical distance of 1000m and a horizontal distance of 1500m from groups/flocks of birds.

9. The Permittee shall ensure that the drill sites avoid known environmentally sensitive areas (denning, nesting etc.) by a minimum of 250 metres.

10. The Permittee shall not locate any operation so as to block or cause substantial diversion to migration of caribou.

11. The Permittee shall not construct any camp, cache any fuel or conduct blasting within 10 km, or conduct any drilling operation within 5 km, of any "designated caribou crossing". The regional biologist should be contacted for known crossings.

12. From May 15 to July 15, the Permittee shall cease activities that interfere with caribou migration or calving, such as the movement of equipment, drilling activities and ATV or snowmobile use until the caribou and their calves have vacated the area.

13. The Permittee shall ensure that during the presence of caribou and muskox within sight and sound of a camp that all personnel will remain quietly in camp.

14. The Permittee shall not conduct any activity associated with the land use operation if critical periods of wildlife cycles are observed (eg. caribou migration, calving, fish spawning or raptor nesting).

15. That the Permittee shall ensure that there is no hunting by employees of the company or any contractors hired unless proper Nunavut authorizations have been obtained.

16. The Permittee shall ensure that there is no fishing by employees of the company or any contractors hired unless proper permits are obtained.

17. The Permittee shall not feed wildlife.

18. The Permittee shall contact the Kitikmeot Regional Biologist to identify areas which should be avoided. Raptor nesting sites and concentrations of nesting or molting waterfowl should be avoided by aircraft at all times.

19. The Permittee shall ensure compliance with Section 36 of the Fisheries Act which requires that no person shall deposit or permit the deposit of a deleterious substance on any type in water frequented by fish or in any place under any conditions where the deleterious substance may enter such a water body.

20. The harmful alteration, disruption or destruction of fish habitat is prohibited under Section 35 of the Fisheries Act. No construction or disturbance of any stream/lake bed or banks of any definable watercourse, is permitted unless authorized by DFO.

21. The Permittee shall not detonate explosives within fifteen (15) metres of any body of water which is not completely frozen to the bottom.

Archaeological Sites

1. The Permittee/ Licensee shall keep a distance of 30 meters away from the known archaeological sit within the project area (See attached letter from GN-CLEY). An archaeological site is defined as a site or work within the Nunavut Settlement Area of archaeological, ethnographical or historical importance, interest or significance or a place where an archaeological specimen is found, and includes explorers' cairns.

2. The Permittee/ Licensee shall follow all terms and conditions for the protection and restoration of archaeological and palaeontological resources as outlined by GN-CLEY in the attached letter.

Reclamation

1. The Permittee shall advise NIRB and the Land Use Inspector in writing at least 15 days prior to the completion of activities.

2. The Permittee shall remove all scrap metal, discarded machinery and parts, barrels and kegs, buildings and building material upon abandonment.

3. The Permittee shall remove all empty barrels from its exploration sites as soon as possible in a progressive manner and shall ensure that all barrels are removed from the land by the end of each field season. Empty barrels shall be disposed of at an approved facility.

4. The Permittee shall complete all clean-up and restoration of the lands used prior to the expiry date of the permit.

5. The Permittee shall undertake ongoing restoration for any land which is no longer required for the Permittee's operation on the land.

6. The Permittee shall plug or cap all bore holes and cut off any drill casings that remain above ground to ground level upon abandonment of the operation.

Other Recommendations

1. NIRB would like to encourage the proponent to hire local people and services, to the extent possible.

2. NIRB strongly advises proponents to consult with local residents regarding their activities in the region, and to do community consultation on the project to keep the communities informed.

3. NIRB would like to encourage the proponent to continue baseline monitoring.

4. Any amendment requests deemed by NIRB to be outside the original scope of the project will be considered a new project.

Validity of Land Claims Agreement

Section 2.12.2
Where there is any inconsistency or conflict between any federal, territorial and local government laws, and the Agreement, the Agreement shall prevail to the extent of the inconsistency or conflict.

Dated ___May 15, 2006____ at Cambridge Bay, NU

_____ _____
Elizabeth Copland, A/Chairperson

ATTACHMENT 5 - AUGUST 5, 2010 NIRB LETTER RE: EXEMPTION FROM SCREENING (FILE NO. 08EA084)

NIRB File Nos.: 06EN033, 08EA084
NWB File No.: 2BE-GEO0210
INAC File No.: N2010C0016

August 5, 2010

Honourable Chuck Strahl
Minister of Indian and Northern Affairs Canada
c/o Spencer Dewar
Manager Land Administration
Indian and Northern Affairs Canada
Iqaluit, NU

Via email: spencer.dewar@inac-ainc.gc.ca

Re: Application exempt from Screening pursuant to Section 12.4.3 of the NLCA: Sabina Gold & Silver Corp.'s "Back River" project

Dear Spencer Dewar:

On July 5, 2010 the Nunavut Impact Review Board (NIRB or Board) received an application from Indian and Northern Affairs Canada (INAC) for a new Land Use Permit (LUP) for Sabina Gold & Silver Corp.'s (Sabina) "Back River" project. Sabina is required to apply for a *new* LUP to replace a previously issued permit which is no longer eligible for renewal (N2006C0008).

Please be advised that the original "Back River" exploration project proposal (NIRB File No.: **06EN033**) was received by the NIRB from INAC on April 18, 2006. The proposal was screened in accordance with Part 4, Article 12 of the Nunavut Land Claims Agreement (NLCA) and on May 15, 2006 the NIRB issued a 12.4.4(a) screening decision to the Minister of INAC which indicated that the proposed project could proceed subject to the project-specific terms and conditions recommended by the NIRB.

Original project components included the following:

- Surface mapping, sampling and diamond drilling activities;
- Exploration program supported by Caterpillar and loader equipment, helicopter, snowmobile, and all terrain vehicle;
- Transportation and storage of fuel, chemical, and hazardous materials;
- Establishment and use of winter roads and trails; and
- Reclamation of drill sites and camp upon project completion.

On December 9, 2008 the NIRB received an amendment and renewal request from Dundee Precious Metals Inc. for their holdings in the Beechy Lake area (including the Back River and Wishbone Trend areas). The request resulted in the consolidation of previous screenings of Dundee Precious Metals Inc.'s holdings within the Back River area into one comprehensive NIRB screening, File No. **08EA084**. The NIRB issued a 12.4.4(a) screening decision to the Minister of INAC for this file on March 3, 2009. The NIRB's assessment of File No. 08EA084 included the following project activities:

- Base metal mineral exploration including prospecting, sampling, soil sampling, exploration trenching, diamond drilling (on land and ice), and air and ground geophysics;
- Use of existing Goose Lake Camp site as base of operations, with maximum capacity of 80 personnel;
- Helicopter assisted drill program, including daily transportation of field crew to drill sites;
- Potential use of snow machines around the Goose Lake area;
- Temporary storage of small fuel caches (up to 19 drums each) throughout the area to support exploration activities;
- Fuel storage at Goose Lake (6 bulk tanks) and George Lake (2 bulk tanks plus drums);
- Storage of chemicals and hazardous materials at site;
- Water use for drilling purposes and camp use;
- Sewage, greywater and waste production related to camp operation;
- Incineration of sewage and combustible wastes;
- Use of Goose Lake for site access via charter aircraft (ice-strip to be used during winter months); and,
- Potential use of esker strip at George Lake camp or gravel strip northwest of Goose Lake during spring "break up" period.

In 2009, Sabina acquired Dundee Precious Metals Inc., including exploratory works undertaken in the "Back River" area.

The current application and the original NIRB screening file for the Back River exploration project (File No. **06EN033**) are available from the NIRB's ftp site at the following link:

http://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/ARCHIVE/2006_SCREENINGS/06EN033-Dundee_Precious_Metals_Inc.(Boulder_Pond)/1-SCREENING/.

Furthermore, the NIRB's consolidated screening of Sabina's exploration of the Beechy Lake area (File No. **08EA084**) including the current request and all related correspondence, is available at:

http://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/ARCHIVE/2009_SCREENINGS/08EA084-Dundee%20Precious%20Metals/1-SCREENING/.

CURRENT APPLICATION

Sabina is applying for a new LUP to authorize its operations at the George Lake and Goose Lake camps, in addition to outlying areas of operation including claim groups at Boot Lake, Boulder Pond and Del Lake – for a period of two years (commencing November 1, 2010). In addition to previously permitted activities in the Back River area, Sabina proposes to include the following activities, which have not been previously screened by the NIRB:

- Establishment of small temporary camps and ice airstrips proximal to exploration areas on an "as-needed" basis; and,
- Storage of fuel and chemicals to be used for exploration activities at locations other than Goose Lake Camp, with established fuel and material storage at the George Lake Camp site.

Please note that Section 12.4.3 of the NLCA states that:

> *"Any application for a component or activity of a project proposal that has been permitted to proceed in accordance with these provisions shall be exempt from the requirement for screening by NIRB unless:*
>
> *(a) such component or activity was not part of the original project proposal; or*
>
> *(b) its inclusion would significantly modify the project."*

On July 14, 2010 the NIRB distributed the current application for a new LUP to a regional distribution list, requesting submission of any comments or concerns related to the application by August 3, 2010.

The following is a summary of comments received from parties regarding the application:

Kitikmeot Inuit Association

- Current application poses no significant change to the general scope of the original project activities
- Previously issued NIRB terms and conditions should be re-issued to current application

Government of Nunavut – Executive and Intergovernmental Affairs (Consolidated Submission)

- No objection to the application for a new LUP including new activities outlined in the application
- Comments submitted during screening of NIRB file 08EA084 still apply to existing activities and to new activities

Department of Environment

- Request Proponent provide full information regarding use of camps and any new activities to be based out of the camps at least 45 days prior to establishment of camp
- Recommendations regarding the closure of winter infrastructure

Government of Nunavut – Culture, Language, Elders and Youth

- No record of known heritage resources within the area identified by the proponent
- Terms and Conditions for the protection and restoration of archaeological and palaeontological resources as issued to the Proponent in 2006 continue to apply

Government of Nunavut – Economic Development and Transportation

- No concerns regarding new LUP application
- Recommend that original terms and conditions be re-issued for the Back River project
- New project components do not significantly change the scope of the original project

Indian and Northern Affairs Canada

- Application does not provide information about the storage of fuel associated with the proposed ice-airstrip
- Request the proponent provide the Lands Administration office with coordinates for new fuel cache locations once established

Environment Canada

- Commend the proponent for thorough Spill Contingency Plans
- Recommend the inclusion of further information within Spill Contingency Plans
- Recommend locations for copies of Plans to be made available

After completing a review of the information provided in support of the current application and the comments received from interested parties, the NIRB is of the understanding that the application for a new LUP does not change the general scope of the original project activities, and the exceptions noted in NLCA 12.4.3(a) and (b) do not apply. Therefore, this application is exempt from screening as per Section 12.4.3 of the NLCA and the activities therein remain subject to the terms and conditions recommended in the original May 15, 2006 and March 3, 2009 Screening Decision Reports (enclosed).

If you have any questions or concerns, please contact Amanda Hanson, Technical Advisor, at 867-983-4615 or ahanson@nirb.ca.

Sincerely,

Stephanie Autut
Executive Director

cc: Peter Manojlovic, Sabina Gold & Silver Corp.
Elizabeth Sherlock, Sabina Gold & Silver Corp.
Phyllis Beaulieu, Nunavut Water Board

Enclosures (2): NIRB Screening Decision Reports, File No.: 06EN033 – May 15, 2006; 08EA084 – March 3, 2009

ATTACHMENT 6 – APRIL 17, 2015 NIRB EXEMPTION FROM SCREENING DETERMINATION

NIRB File No.: 08EA084
NWB File No.: 2BE-GEO1015

April 17, 2015

Thomas Kabloona, Chairperson
Nunavut Water Board
c/o Phyllis Beaulieu, Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Sent via email: phyllis.beaulieu@nwb-oen.ca

Re: Application Exempt from the Requirement for Screening pursuant to Section 12.4.3 of the NLCA: Sabina Gold & Silver Corp's "Beechy Lake Area" project, Kitikmeot Region

Dear Phyllis Beaulieu:

On March 11, 2015 the Nunavut Impact Review Board (NIRB or Board) received an application from the Nunavut Water Board (NWB) for a renewal to the Type B Water Licence (No. 2BE-GEO1015) for Sabina Gold & Silver Corporation's (Sabina) "Beechy Lake Area" project proposal. The Board notes that a conformity determination from the Nunavut Planning Commission was not required for this file, as the proposed project is located within a region that does not currently have an approved land use plan in place (Kitikmeot Region).

Please be advised that the original project proposal (NIRB File No.: 08EA084) was received by the NIRB from Indian and Northern Affairs Canada (INAC; now Aboriginal Affairs and Northern Development Canada or AANDC) on December 9, 2008 and was screened by the Board in accordance with Part 4, Article 12 of the Nunavut Land Claims Agreement (NLCA). On March 3, 2009 the NIRB issued a NLCA 12.4.4(a) screening decision to the Minister of INAC which indicated that the proposed project could proceed subject to the NIRB's recommended project-specific terms and conditions.

Additional authorization and extension requests associated with the "Beechy Lake Area" project have also been reviewed by the NIRB following screening of the original project proposal (File No. 08EA084); a summary of the additional applications associated with NIRB File No. 08EA084 is presented in Table 1.

Table 1: Additional applications associated with NIRB File No. 08EA084

Authorization	Application			NIRB Decision	
	Date Received by NIRB	Type	Reason for Application	Date Issued	Type
AANDC LUP N2010C0015	May 26, 2010	New LUP	Replace LUP N2004C0005 and continue exploration activities	June 14, 2010	Reissued March 3, 2009 SDR
AANDC LUP N2010C0016	July 5, 2010	New LUP	Replace LUP N2006C0008 and continue exploration activities	August 5, 2010	Reissued March 3, 2009 SDR and May 15, 2006 SDR for 06EN033
NWB Type B Water Licence 2BE-GOO0510	December 7, 2010	Amendment	Additional exploration activities	December 9, 2010	Reissued March 3, 2009 SDR and May 15, 2006 SDR for 06EN033
AANDC LUP N2012C0003	January 3, 2012	New LUP	Continue exploration activities	January 24, 2012	Reissued March 3, 2009 SDR
KIA Land Use Licence KTL304C017	February 1, 2012	Amendment	Upgrade airstrips and access roads	March 16, 2012	Reissued March 3, 2009 SDR with *additional* terms and conditions
AANDC LUP N2010C0015; NRI 0404011R-M	October 25, 2012 LUP; October 6, 2012 NRI	Extension	Continue exploration and research activities	October 31, 2012	Reissued March 16, 2012 SDR and May 16, 2007 SDR for 07YN030
AANDC LUP N2010C0016	October 9, 2012	Extension	Continue exploration activities	November 28, 2012	Reissued March 16, 2012 SDR
AANDC LUP N2010C0016	September 26, 2013	Extension	Continue exploration activities	November 15, 2013	Reissued March 16, 2012 SDR
AANDC LUP N2013C0017	October 1, 2013	New LUP	Replace LUP N2010C0015 and continue exploration activities	November 14, 2013	Reissued March 16, 2012 SDR and April 1, 2004 SDR for 04EN012
AANDC LUP N2012C0003	January 10, 2014	Extension	Extend LUP for 1 year to continue exploration activities	February 28, 2014	Reissued March 16, 2012 SDR
AANDC LUP N2010C0016	October 2, 2014	Extension	Continue exploration activities	October 20, 2014	Reissued March 16, 2012 SDR
NWB Type B Water Licence 2BE-GOO1015	December 8, 2014	Renewal	Continue exploration activities	January 27, 2015	Reissued March 16, 2012 SDR

Notes: AANDC=Aboriginal Affairs and Northern Development Canada; KIA=Kitikmeot Inuit Association; LUP=Land Use Permit; NRI=Nunavut Research Institute; NIRB=Nunavut Impact Review Board; SDR=Screening Decision Report; NWB=Nunavut Water Board.

The current NWB application, the original NIRB Screening Decision Report (File No. 08EA084) and related file information are available from the NIRB's online public registry at the following location:

http://ftp.nirb.ca/01-SCREENINGS/COMPLETED%20SCREENINGS/2009/08EA084-Dundee%20Precious%20Metals-Sabina/.

PREVIOUSLY-SCREENED PROJECT PROPOSAL:

As previously screened by the NIRB (File No. 08EA084), the "Beechy Lake Area" project was located within the Kitikmeot region, approximately 160 kilometres (km) south-south east of the Bathurst Inlet outpost camp, and 400 km south of the Hamlet of Cambridge Bay. The Proponent indicated that it intended to conduct mineral exploration activities on claims within the Wishbone/Hackett River area (including Wishbone, Del Lake, Lovechild, Mahna Mahna, and Malley claims) as well as at its core properties (including Goose Lake, George Lake, Boot Lake and Boulder Pond claims). Exploration activities were initially proposed to occur from March 1, 2009 to September 30, 2009 and were expected to continue into 2010. The Proponent also proposed to conduct prospecting activities on the areas to the north and south of the "Wishbone" area during 2009, with potential drilling to follow in these areas during 2010 and 2011.

The activities and components associated with the previously screened proposal included:

- Base metal mineral exploration; including prospecting, sampling, soil sampling, exploration trenching, diamond drilling (on land and on ice), and air and ground geophysics;
- Use of existing Goose Lake Camp site as the base of operations, with maximum capacity of 80 personnel;
- Helicopter supported drill program, including daily transportation of field crew to drill sites;
- Potential use of snow machines around the Goose Lake area;
- Use of temporary fuel caches (up to 19 drums each) throughout the area to support exploration;
- Fuel storage at Goose Lake (6 bulk tanks) and George Lake (2 bulk tanks and drums);
- Storage of chemicals and hazardous materials at site;
- Water to be used for drilling and camp uses;
- Sewage, grey water and waste production related to camp operation;
- Incineration of sewage and combustible waste;
- Use of Goose Lake for summer access via aircraft; winter use of an ice-strip at Goose Lake; and,
- Potential use of esker strip at George Lake camp or gravel strip northwest of Goose Lake during breakup period in spring.

The activities and components associated with the previous May 26, 2010 application included:

- Continued exploration of the Hackett River and Wishbone areas including the Hackett River camp.

The activities and components associated with the previous July 5, 2010 application included:

- Operations at the George Lake and Goose Lake camps, in addition to outlying claim areas at Boot Lake, Boulder Pond and Del Lake – for a period of two years (commencing November 1, 2010).

- Establishment of small temporary camps and ice airstrips proximal to exploration areas on an "as-needed" basis; and,
- Storage of fuel and chemicals used for exploration activities at locations other than Goose Lake Camp, with established fuel and material storage at the George Lake Camp site.

The activities and components associated with the previous December 7, 2010 water licence amendment application included:

- Establishment and use of winter roads and trails;
- Increase water volume use to 297 cubic metres per day (m^3/day);
- Include water use for purposes of water diversion, collection, dust management, and water crossings; and,
- Include open burning of untreated wood products such as paper, cardboard and lumber.

The activities associated with the January 3, 2012 application included a new Land Use Permit to continue previous exploration activities.

The activities and components associated with the previous February 1, 2012 amendment to the KIA Land Use Licence (No. KTL304C017) included the following additional components:

- Increase camp size to a maximum of 120 personnel;
- Construction of an all-weather airstrip (previously an ice airstrip, screened under NIRB File No. 06EN033);
- Conversion of a previously permitted winter road/trail (screened under NIRB File No.06EN033) to an approximately one (1) kilometre all-weather road connecting the new all-weather airstrip to the Goose Camp;
- Conduct quarrying activities to supply construction materials for the all-weather airstrip and road connecting the airstrip to the Goose Camp, including:
    - Establishment of three new quarry sources;
    - Estimated total of up to 27,000 cubic metres of material required for construction of both the airstrip and road; and,
    - Transportation between quarry sites and either the airstrip or road during snow/ice conditions only, via previously permitted winter corridors; and
- Proposed activities to occur through 2013.

The activities associated with the previous October 6, 2015 and October 25, 2012 application included an amendment and extension to the AANDC LUP for the project (No. N2010C0015) to allow for continued exploration activities and the collection of baseline data throughout 2012 and 2013 (per previously issued Scientific Research Licence No. 04 040 11R-M).

The activities associated with the previous October 9, 2012 application for an extension to the AANDC LUP for the project (No. N2010C0016) included the continuation of exploration activities in the Back River, Wishbone and Malley areas.

The activities associated with the previous September 26, 2013 application were to extend its AANDC LUP (No. N2010C0016) for one additional year to continue exploration activities in 2013 and 2014.

The previous October 1, 2013 application submitted by Glencore Canada Corporation for a new AANDC LUP (No. N2013C0017) to replace the previously issued and expiring permit (No. N2010C0015) held by Xstrata Canada for ongoing exploration of the Hackett River-Wishbone areas included the following activities:

- Ongoing exploration of the Hackett River and Wishbone areas using the existing Hackett River camp (previously screened NIRB File No. 08EA084 and 04EN012, as related to File No. 08MN006 currently undergoing Review by the NIRB under Section 12.5 of the NLCA);
- Construction of temporary camps for up to 15 people erected to support exploration and resupply activities (including but not limited to D'Arcy Lake, Bathurst Inlet proposed port location, proposed BIPR road route and Contwoyto Lake areas; previously screened per NIRB File No. 08EA084); and
- Increase the area permitted for work to conduct mapping, geophysical surveys and geotechnical drilling to identify best locations for BIPR infrastructure including but not limited to: port, tank farm, airstrip, road, bridge and camps (associated with NIRB File No. 03UN114 currently undergoing Review by the NIRB under Section 12.5 of the NLCA).

The activities associated with the previous January 10, 2014 application for a one year extension to the AANDC LUP (No. N2012C0003) for the project included continuation of exploration activities, specifically diamond drilling, geophysical surveys, and field mapping, in the Beechy Lake area.

The activities associated with the previous October 2, 2014 application for a one year extension to the AANDC LUP (No. N2010C0016) for the project included continuation of exploration activities.

The activities associated with the previous December 8, 2014 application for a five year renewal to the NWB (No. 2BE-GOO1015) for the project included continuation of exploration activities.

CURRENT APPLICATION:

Sabina is currently proposing to renew its Type B Water Licence (2BE-GEO1015) with the NWB for a term of 5 years (until June 30, 2020) to continue previously-approved exploration activities in the project area.

Please note that Section 12.4.3 of the NLCA states that:

> *"Any application for a component or activity of a project proposal that has been permitted to proceed in accordance with these provisions shall be exempt from the requirement for screening by NIRB unless:*
>
> *(a) such component or activity was not part of the original project proposal; or*
>
> *(b) its inclusion would significantly modify the project."*

After completing a review of the information provided in support of the current application, the NIRB is of the understanding that the proposed renewal does not change the general scope of the original project activities, and the exceptions noted in NLCA 12.4.3(a) and (b) do not apply. Therefore, this application is exempt from the requirement for screening pursuant to Section 12.4.3 of the NLCA and the activities therein remain subject to the terms and conditions recommended in the original March 16, 2012 Screening Decision Report (enclosed).

If you have any questions or require additional clarification, please contact Kristina Benoit, Technical Advisor, at (867) 983-4607 or kbenoit@nirb.ca.

Sincerely,

Ryan Barry
Executive Director
Nunavut Impact Review Board

cc: John Laitin, Sabina Gold & Silver Corp.
Geoffrey Clark, Kitikmeot Inuit Association
Luigi Torretti, Kitikmeot Inuit Association
Tracey McCaie, Aboriginal Affairs and Northern Development Canada

Enclosure: NIRB Screening Decision Report, File No.: 08EA084 (March 16, 2012)

ATTACHMENT 7 - COMPREHENSIVE SPILL CONTINGENCY PLAN

Comprehensive Spill Contingency Plan

June 2018

Table of Contents

List of Figures

List of Tables

1. Introduction and Background

1.1. BACKGROUND

Sabina Gold & Silver Corp. (Sabina) is actively exploring the Back River property mineral rights Including the Goose Property (and primary exploration camp at Goose Lake), as well as George Property (and a temporary exploration camp), unoccupied claim groups referred to as Boot Property, Boulder Property, Wishbone Property, Malley/Needle Property, and Del Property (Figure 1) and development works for the Back River Project (the Project).

1.2. PURPOSE

This spill emergency plan has been implemented to ensure that Sabina respects all applicable laws, regulations and requirements from federal and territorial authorities. Sabina has obtained and complies with all required permits, approvals, and authorizations required for the operations. The following regulations and documents constitute an integral part of the Plan:

- Government of Nunavut's *Spill Contingency Planning and Reporting Regulations.*
- The Canadian Environmental Protection Act controls hazardous substances from their production and/or import, their consumption, storage and/or disposal.
- The federal *Fisheries Act* protects fish and their habitat from pollution and disturbances. Fisheries and Oceans Canada reviews permit applications and restoration plans submitted by other agencies.
- The federal *Transportation of Dangerous Goods Act* and Regulations ensure the protection of public health and safety, and the environment during the handling and transport of dangerous goods. The Regulations apply to all modes of transportation, by road, by sea, and by air.
- The federal *Territorial Land Use Regulations* define regulatory measures to maintain appropriate environmental practices for any land use activities on territorial lands that are under the control, management and administration of the Crown. These regulations require that land use permits be issued for operations such as mineral exploration and mining.
- The Guidelines for Preparation of Hazardous Material Spill Contingency Plans describe parameters that should be considered in the development of hazardous material spill emergency plans. It also defines the information that should be incorporated into a comprehensive contingency plan.
- The CCME Code of Practice for Used Oil Management defines appropriate environmental options for handling, storage, collection, recycling, transport, reuse, and/or disposal of used oils in Canada. It helps regulatory authorities formulate provincial and/or regional strategies for used oil management.
- The *Nunavut Environmental Protection Act* governs the protection of the environment from contaminants. The Act defines offences and penalties as well as the powers of government inspectors.
- The *Nunavut Spill Contingency Planning and Reporting Regulation*s describe requirements for spill reporting and emergency planning.

- The Field Guide for Oil Spill Response in Arctic Waters developed for the Emergency Prevention, Preparedness and Response Working Group, describes precise response methods and strategies for emergency response operations and provides technical support documentation.
- The *Land Transportation Emergency Response Guideline* for Petroleum Spills developed by the Canadian Petroleum Products Institute outlines scope, emergency response code of practice, response time guidelines, response equipment and personnel capability requirements.
- The *Canada Shipping Act* (CSA), as amended by Chapter 36, stipulates that operators of designated Oil Handling Facilities must have an on-site Oil Pollution Emergency Plan.
- The *Canada Shipping Act* Response Organizations and Oil Handling Facilities Regulations (sor/95-405) apply.

This document is a review and analysis of the preparedness for events which may occur due to unforeseen circumstances. The plan details response actions to be taken in the event of unintentional materials release during the ongoing exploration program and associated support such as camps and overland transport. The plan is dynamic and will be updated at least annually to address any significant changes in operating plans, should they occur.

A copy of the Plan will be available at the exploration camps and headquarter offices. **This plan applies to water licenses 2BE-GOO1520, 2BE-GEO1520, 2BE-MLL1722, and 8BC-BRP1718.** Sabina believes building on experience and practices gained through implementation and management of spill measures under existing water licence and supports the implementation of a coordinated approach to spill response.

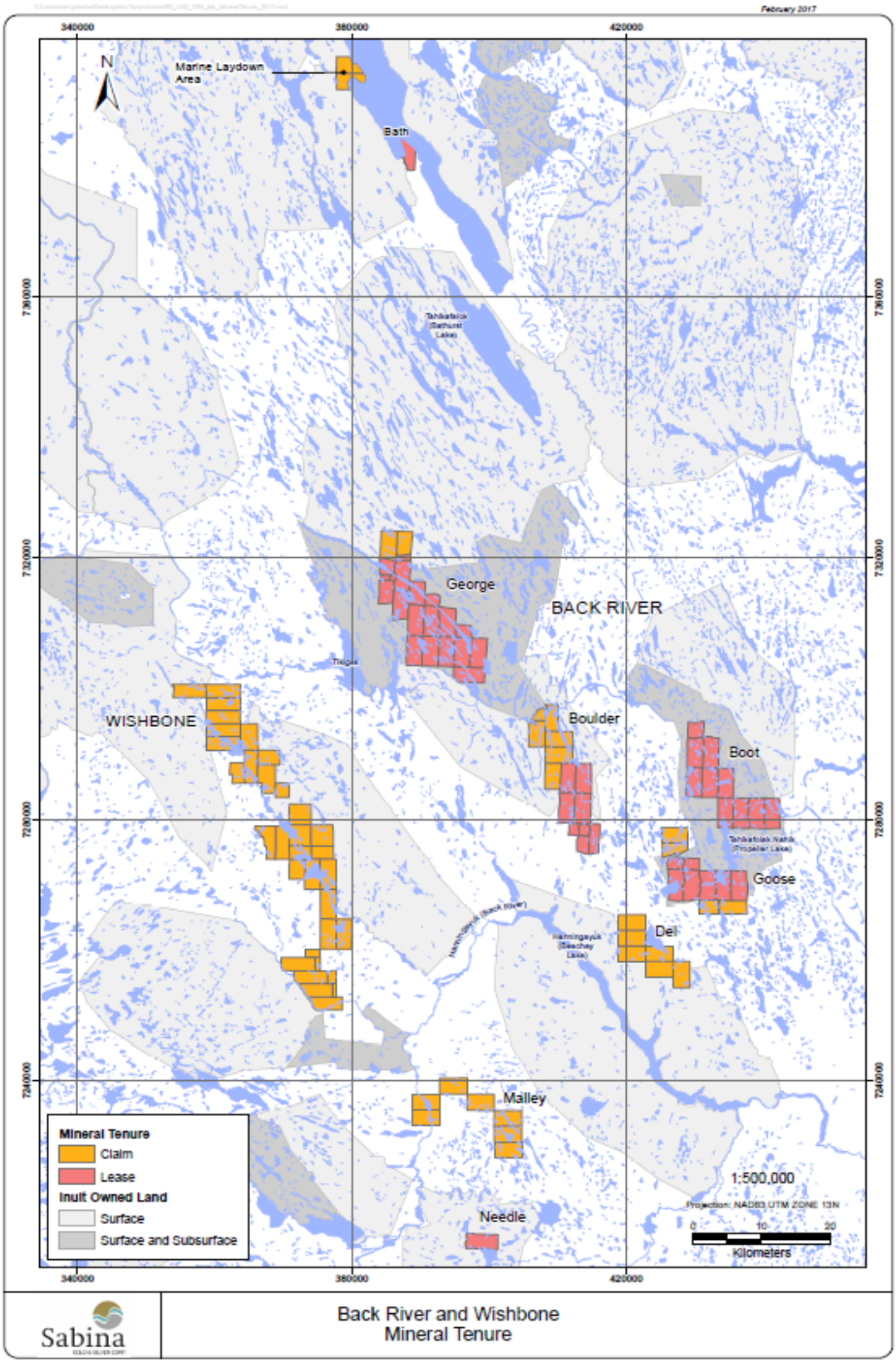


Figure 1. Location Map of Sabina Exploration Properties within western Nunavut.

1.3. SABINA SOCIAL AND ENVIRONMENTAL POLICY

Sabina is committed to environmentally responsible and socially acceptable exploration and mining practices. We are dedicated to creating and maintaining a safe environment for both the land we occupy and the people that drive its success. The company's philosophy is to conduct its operations to protect not only the environment, but the health and safety of its employees and the public as well.

Sabina also subscribes to the principles of sustainable development in mining. While exploration and mining cannot occur without an impact on the surrounding natural environment and communities, our responsibility is to limit negative environmental and social impacts and to enhance positive impacts.

To achieve these goals, Sabina is committed to:

- Seeking to be environmental leaders in the mining community by integrating responsible environmental management as an essential component of all business decisions;
- Comply with all applicable laws, regulations and standards; uphold the spirit of the law and where laws do not adequately protect the environment, apply standards that minimize any adverse environmental impacts resulting from its operations;
- Communicate openly with employees, the regulatory community and the public on environmental issues and address concerns pertaining to potential hazards and impacts;
- Assess the potential affects of operations and integrate protective measures into the planning process to prevent or reduce impacts to the environment and on public health and safety;
- Take appropriate corrective actions should unexpected environmental impacts occur. This will also include taking appropriate action to prevent reoccurrence of these impacts.
- Provide adequate resources, personnel and training so that all employees are aware of and able to support implementation of the environmental and social policy;
- Conduct and support research and programs that improve understanding of the local environment, conserve resources, minimize waste, improve processes, and protect the environment.
- Working with the appropriate local regulators and agencies, maximize benefits to the affected communities and residents;
- Balance all decisions with best management practices, scientific principles, and Traditional Knowledge.

1.4. SABINA POLICY ON INITIATION FOR CLEANUP ACTIVITIES

Sabina initiates cleanup activity when, in the opinion of management, Sabina is clearly associated, or likely associated with the spilled product. The guiding principles of Sabina’s Comprehensive Spill Contingency Plan is to comply or exceed existing regulations to ensure protection of the environment, and to keep employees, government officials, and the public aware of our plans.

1.5. RISK MANAGEMENT

The likelihood of a significant spill event occurring at the Project at either the Goose or George tank farms is very low, due to the double-walled tanks contained in the lined, bermed area, and the prescribed procedures for fuel transfer and anti-siphon devices in the tanks.

The greatest likelihood of an incident is associated with drummed fuel including the rupture of drums during movement or leaks during storage. The first risk can be mitigated through proper operator training

of equipment operation, clear marking and segregation of fuel supplies and heightened operator awareness when working near fuel supplies. The second risk is mitigated with secondary containment and frequent inspection of the drums (carried out during regular yard duties). Additional hazards are present during refuelling operations (mitigated with drip trays and absorbent mat), and during local drum movement (e.g., from storage to helipads), which is mitigated by using experienced operators, carefully securing the drums to the loader during movement, and safe driving practices.

As salt is delivered in pelletized form, any spill is easily cleaned-up. Regular inspection of this storage area will allow for rapid detection of any spill.

Explosives will be delivered in designated compartments approved for transport of explosives and stored within the original packaging in the magazines. Strict housekeeping and tracking standards will be kept. Any spill of explosive material would be easily cleaned up and regular inspection will allow for rapid detection of any spill.

Frequent inspections of the greywater line will turn up any leaks in the system which can be quickly repaired. Any issues would likely be noticed by most people in camp as either moisture and/or an odour would be present.

The likelihood of drill additives entering a waterbody is extremely small. With the exception of on-ice drilling, drills are located at least 31 m above the high water mark of lakes, ponds and streams, unless otherwise approved by the Board, with vegetation and overburden material providing an effective mechanical barrier to the transport of materials to the waterbody. As an added mitigation measure, geo-textile cloth fences are constructed on the downhill side of all new drill setups. For on-ice drilling, excess return water is pumped to a point on shore more than 31 m from the estimated high water mark (difficult to determine conclusively due to snow cover). Snow and lake ice also create an effective barrier and containment mechanism for spills of material at the drill site, allowing for easy cleanup. Drill sites are inspected for cleanliness upon completion of the hole.

Despite the mitigation measures taken, should any incident arise as a result of human error or unforeseen circumstances, the operating procedures outlined in this document will be implemented.

1.6. EXISTING FACILITIES

The Sabina mineral exploration camps are located in the Kitikmeot Region approximately 520 km northeast of Yellowknife, NWT and 400 km southwest of Cambridge Bay, NU.

1.6.1. Goose Exploration Camp

The Goose Exploration Camp is the primary camp for the Project and is located on the slope of the western shore of Goose Lake (Figure 2). It has the capacity to support up to 120 people (as of June 2012) and is accessible by air only using Goose Lake (ice and open water), a gravel airstrip north of Goose Lake and an all-weather airstrip and road west of the camp. The lakeshore is approximately 50 m toward the north and the regional topographical gradient surrounding the camp ranges from 2 to 6% towards the north. The camp is approximately 300 m in length from east to west and 100 m wide from north to south, covering an area of 30,000 m^2. The camp facilities are located on natural tundra underlain by a 10 cm organic layer overlying silt-sand parent material.

- Latitude: 65º 32’N, Longitude: 106º 25’W
- UTM Coordinates 569405 E, 7265007N on NTS Map Sheet 76G/09

Figure 2. Aerial image of Goose Exploration Camp looking west. Photograph taken August 2013.

1.6.2. Temporary Camps for Resupply for Exploration

Temporary camps for up to 20 people are established for a season in target areas away from the main camps and would be established for safety, environmental, and economic reasons. The intent is not to establish a network of camps across the exploration area, but to have the opportunity and flexibility to establish these temporary camps as needed. No sewage system will be installed in the camp as no water is needed for Pacto toilets. All solid waste will be carried to the existing camps (Goose and/or George) and disposed as outlined in the approved waste management plan.

Grey-water is pumped to a suitable disposal sump or natural depression located 31 metres away from the ordinary high water mark of any local waterways and would be allowed to naturally percolate into the underlying ground.

1.6.3. Overland Corridors

A winter road links the two camps (Goose and George) and extends to Bathurst Inlet. Temporary camp facilities and fuel and chemical storage areas may also be accessed as needed to support exploration activities.

Overland transportation occurs during mid-February to mid-May depending on environmental conditions and operational requirements. Environmental conditions that will determine the route include:

- Ice thickness of a sufficient thickness to support heavy equipment so that pumping and using water to build up will be unnecessary.
- Snow thickness will be a minimum of 15 cm on land to prevent damage to soil and vegetation.
- Weather conditions permit safe transport of equipment and materials.

Diesel fuels and lubricants will be used during the construction and operation of the winter road. Other fuel and materials to be transported along the corridor include diesel fuel, aviation gas, drilling additives such as calcium chloride and construction materials.

Storage of these products and wastes will be in compliance with legislation and the National Fire Code that ensures the hazardous materials are stored safely, in a dry manner with clear labeling and secondary containment. All storage areas will be clearly identified with proper labeling and signage. All storage areas will be regularly inspected and stored at least 100m from the high water mark of any waterbody within secondary containment.

Material Safety Data Sheets (MSDS) information for the potential contaminants and products to be transported along the winter road are available on-site.

2. Materials Transport and Storage

2.1. FUEL STORAGE

As per 2BE-GOO1520 and 2BE-GEO1520, diesel fuel is required to generate power on-site, heat buildings, and to fuel mobile equipment. The diesel fuel storage at the camps consists of 205 L drums, as well as double walled tanks (up to 75,000 L ULC-approved) and bladders (up to 40,000 L) situated within a lined secondary berm. Secondary containment (Instaberms) is used for all of the drummed fuel on-site.

Supplies will be replenished with quantities dependent on the scope of the program. Inventories of fuel at each site are dynamic and dependent on exploration activities and personnel in camp.

Drummed fuel is required to support drilling and helicopter activities outside of camp and strategically relocated as required. All drums are located at least 30 m above the high water mark of any waterbody. Specialized oils and greases used by the drilling contractors are stored in sheds or sea-cans designated for that purpose. Propane tanks are stored on pallets, strapped together, and area marked with pylons.

For development works no additional fuel storage is required at the Goose Property; existing permitted fuel requirements under 2BE-GOO1520 will be maintained. The Goose Property has thirteen 75,000 L double walled tanks and one 40,000 L bladder. Fuel required to support development works, ongoing exploration activities, and environmental monitoring programs, will be initially mobilized to the MLA in twenty approximately 30,000 L double walled fuel tanks. These tanks are installed within tertiary arctic-grade Insta-berms. This temporary storage of fuel is required as permanent storage tanks are under construction. As built drawings, will be provided 90 days following installation.

One 15 ML field erected fuel tank will be constructed at the MLA. Construction of the fuel tank and the fuel storage area and transfer facilities is proposed to occur under this Application; however, Sabina does not intend to mobilize fuel into this tank as part of this Type B Water Licence. The MLA Fuel Storage Area will be constructed in conformance with the Canadian Council of Ministers of the Environment (CCME) Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (CCME 2003), and the Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations (2008). Project fuel storage facilities will be designed to have bermed spill containment with capacity equal to the volume of the largest tank plus 10% of the volume of the remaining tanks, or 110% volume of the largest tank, whichever is greater. The fuel tank storage areas embankments (or bund) will be lined with HDPE for spill containment. The fuel storage areas will be provided with standard instrumentation and controls to monitor and safely manage the inventory in the tanks. For additional information related to the design of the fuel storage facilities, please see the Fuel Management Plan. Sabina is committed to provide detailed designs for construction of the 15 ML fuel storage and fuel transfer facilities at the MLA to the NWB at least 60 days prior to construction.

2.2. DOMESTIC GREYWATER, SEWAGE AND CONTACT WATER

Greywater from the kitchen and shower facilities is screened for coarse particles (e.g., food), and released to a sump for settling, after which it is released to the environment. Sewage is dealt with using a Pacto toilet system with incineration of the waste generated.

Contact water is water that collects within the fuel secondary containment berms. This water is transferred out of each containment once the depth of water is equal, or greater, than 10 cm and treated

using oil/water separator. Post treatment, the contact water is contained within a dedicated berm/tank system and tested for compliance with current water licence thresholds. If in compliance with current thresholds of the water licence it is released to the environment.

For development works no additional management of domestic greywater, sewage and contact water is required. Management will be done in accordance with 2BE-GOO1520 and 2BE-GEO1520 water licence terms and conditions.

2.3. SOLID WASTE

Combustible solid wastes generated from the camp activities are incinerated. Products such as putrescible domestic and office waste are burned. Noncombustible wastes such as scrap metal, non-reusable barrels, incinerator ash, etc., are placed in megabags and are removed from site using back-haul flights to Yellowknife. Hazardous solid waste for backhaul is sealed in drums for transport to Yellowknife.

Although the potential for waste rock (including drill core) currently stored to be acid producing is unlikely, any such waste would be disposed of in an approved location and under acceptable practices.

Drill cuttings are collected and returned from the drill location to Goose Exploration Camp for disposal in the trench. Sludge from the core saws is also collected and disposed in the exploration trench south of camp.

For development works no additional management of solid waste is required. Management will be done in accordance with 2BE-GOO1520 and 2BE-GEO1520 water licence terms and conditions.

2.4. CHEMICALS

Sabina is committed to the safe and proper handling of waste materials to ensure minimal environmental impact and land disturbance. Waste chemicals that require special attention and handling include waste oil, hydraulic oil, lubricating oil, calcium chloride, grease, and ethylene glycol.

Waste oil is used to either, heat the warehouse, maintenance and core logging facilities, or to fuel the incinerator at Goose Exploration Camp. If not used to fuel heaters or incinerator, waste oil and oil from filters are backhauled for appropriate disposal. Drained spent oil filters will be stored in drums for removal from the site for disposal at an authorized disposal facility.

There are minimal quantities of reagents such as dilute HCl (<5L), concentrated HNO_3 (vials of <10mL), and other materials on-site for geological testing and environmental sample preservation.

Sabina anticipates the maximum quantity of ammonium nitrate (in sold form) at the MLA during initial development works at any time during the calendar year to be 1525 tonnes.

Calcium chloride is added to the fresh water to form a brine solution that acts as antifreeze when drilling in permafrost conditions. The drilling return water is reheated and reused using a mega-bag system which catches the drill cuttings as well. Salt is stored in bags, with 28 sealed in a megabag and placed on a pallet.

Explosive products, when/if on-site, will be stored in appropriate facilities at designated explosives storage site(s).

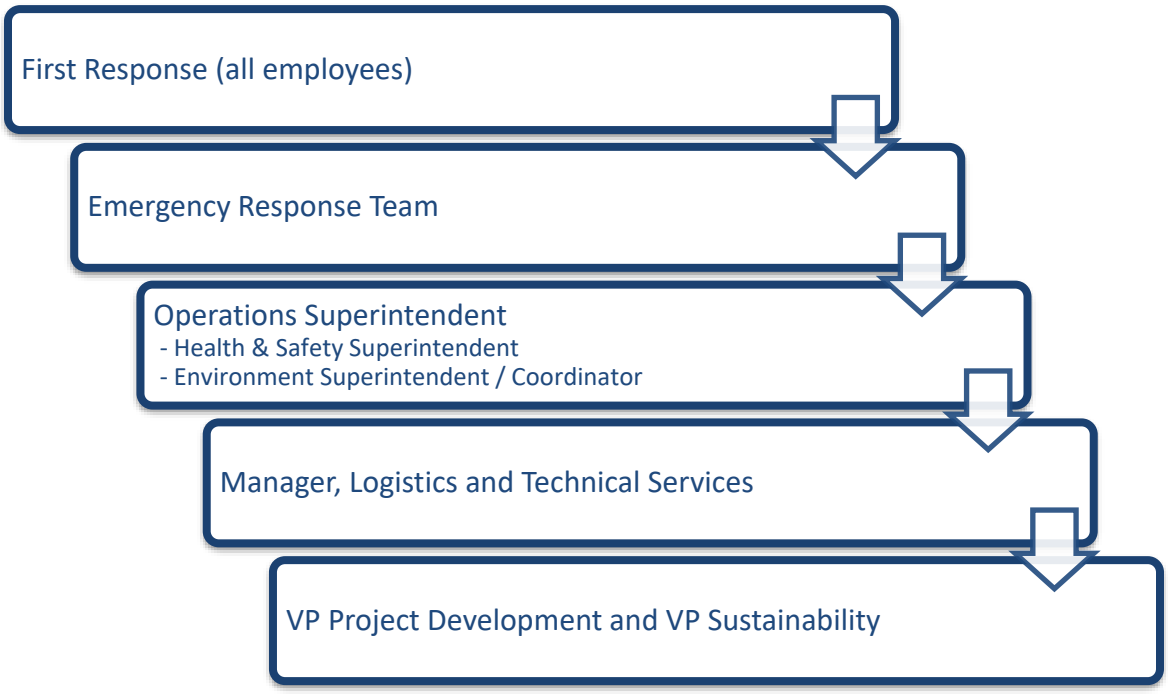
Fire extinguishers and dust suppression is also used on-site as needed and is stored in appropriate facilities. Small quantities of various household chemicals are on-site for domestic use.

MSDS will be collected and kept at the site for all chemicals and fuel products. Appropriate storage and handling of these products will be undertaken.

For development works no additional management of hazardous waste is required. Management will be done in accordance with 2BE-GOO1520 and 2BE-GEO1520 water licence terms and conditions.

3. Roles and Responsibilities

The general response and notification chart is presented in the following:



3.1. ALL EMPLOYEES (FIRST RESPONDERS)

- Immediately warn other personnel working near the spill area.
- Evacuate the area if the health and safety of personnel is threatened.
- Notify direct supervisor or Site Superintendent, who will initiate the spill response operations.
- In the absence of danger, take any safe and reasonable measure to stop, contain and identify the nature of the spill.
- Participate in spill response as directed by the Site Superintendent.

3.2. EMERGENCY RESPONSE TEAM (SPILL CLEANUP CREW)

- Members determined by Site Superintendent based on response needs.
- Conduct cleanup of significant spills under direction of Site Superintendent.

3.3. SITE SUPERINTENDENT

- Assemble and manage the Emergency Response Team, as required.
- Ensures cleanup is completed to Sabina standards in line with direction from the Manager, Logistics and Technical Services (TS), Health & Safety Superintendent, Environmental Superintendent and Environmental Coordinator.

- Notify Manager, Logistics and TS, Health & Safety Superintendent, and Environmental Superintendent/Coordinator of incident.
- Provides update within Sabina in camp and headquarters.
- Record date, location (GPS), material spilled, volume, reason for release, any negative impact, status of cleanup, and corrective actions taken.
- Keep and maintain database of all reportable and non-reportable spills as identified in the Plan.
- Conducts ongoing monitoring of cleanup operations leading to close-out.
- Notify HQ staff including VP Project Development and VP Sustainability for any reportable spills as identified in this plan
- Classify spill level as minor, moderate or major and ensure appropriate response initiated
- Assists in developing effective spill management and prevention practices.
- As directed by the VP Project Development and Manager, Logistics and TS report spill to 24-hour Spill Reporting Line.
- Liaise with NWT/NU applicable agencies regarding on-going cleanup activities.
- Co-ordinate inspections and spill closure by applicable agencies.
- Assist in spill response training and exercises.

3.4. MANAGER LOGISTICS AND TECHNICAL SERVICES

- Provides advice and ensures cleanup is completed to Sabina standards in line with direction from the Site Superintendent and VP Sustainability.
- Ensures Emergency Response Team is adequately trained in spill response.
- Ensures Emergency response and/or monitoring equipment and supplies are regularly inspected and maintained
- Organize with Site Superintendent spill response training and exercises.
- Lead investigation and identify measure and/or training to prevent similar spills.

3.5. ENVIRONMENTAL SUPERINTENDENT AND COORDINATOR

- Provides advice and ensures spill is documented appropriately as per this plan and regulatory requirements.
- Record date, location (GPS), material spilled, volume, reason for release, any negative impact, status of cleanup, and corrective actions taken; confirm these details with Site Superintendent.
- Obtain photographs of spill site before cleanup starts if possible and after the cleanup has been completed. Take pictures of undisturbed area beside the spill area for a comparison. If spill occurs on snow, stake or otherwise identify the affected area so that it can be evaluated once the snow melts.
- As directed by the VP Sustainability and Site Superintendent liaise with NWT/NU applicable agencies regarding on-going cleanup activities, inspections and incident closure
- Assist in initial and ongoing response efforts.
- Provide advice to assist with cleanup.
- Co-ordinate inspections and spill closure by applicable agencies.
- Assist with investigation and identify measure and/or training to prevent similar spills.

3.6. HEALTH & SAFETY SUPERINTENDENT

- Assist in initial and ongoing response efforts.
- Provide advice to assist with cleanup.
- Assist with investigation and identify measure and/or training to prevent similar spills.

3.7. VP PROJECT DEVELOPMENT AND VP SUSTAINABILITY

- Engage Legal Counsel and Sabina Senior Management and Board of Directors as required.
- Notify and update Senior Management and Board members as required.
- Notify and communicate with the Kitikmeot Inuit Association regarding any spills reported to the NT/NU Spill Report Line

4. Training and Testing

4.1. TRAINING

4.1.1. Site Orientation

On-site orientation will be provided to all on-site personnel to ensure employees are aware of:

- What First Responders are to do in case of a spill.
- The location of MSDS sheets and Spill Report Forms.
- The location of the Spill Response Kits.
- The general locations of fire extinguishers and firefighting equipment.
- The location of the Spill Action Plan and the Fire Action Plan.

4.1.2. Role Specific

Specific on-site training will be provided to all employees, whose job function may have a higher probability of experiencing a spill, to ensure they are aware of:

- WHMIS and Transportation of Dangerous Goods.
- Identify and avoid the conditions which may lead to a spill.
- Develop an understanding of the potential environmental impacts of a spill.
- Develop and understanding of the financial costs of a spill.
- Recognize the hazards associated with sources of ignition (smoking, electrical sparks) near a fuel source.
- Spill kit contents and use of them.
- Turn off valves to stop the flow of fuel.

For employees involved in fuel handling, additional training would be provided regarding appropriate refuelling techniques and drum handling procedures.

4.1.3. Emergency Response Team

Members of the Emergency Response Team will be provided a higher level of training to allow for safe and adequate response. This includes:

- All information given as part of the Role Specific Training.
- Fire extinguishers and water pump locations and use.
- Details of the Spill Action Plan and the Fire Action Plan.
- Identify, evaluate and mitigate the hazards posed by any spilled product by using appropriate PPE (personal protective equipment).

4.1.4. Community Support

Sabina is committed to providing spill response training to representatives of the communities of Kingaok and Umigmaktok. This includes:

- Spill training;
- Emergency response; and
- Notification.

4.2. TESTING

A spills drill is to be held twice annually, approximately 6 months apart, at each field operation. This drill must include a familiarization of all on-site personnel on their responsibilities including what to do in case of a spill. The drill must also include a hands-on scenario where the Emergency Response Team utilizes equipment to deal with the spill scenario. The drill may be broken down into two or more sessions to ensure adequate coverage. Records of this testing are to be kept on file and posted to provide access for those who were unable to attend.

5. Spill Response Equipment

5.1. GENERAL EQUIPMENT

Heavy equipment and aircraft may be used in the area for emergency use to respond to spill incidents. Spill kits and spill response equipment are to be located in key locations and are to be accessible to responders.

Site specific maps illustrating spill kit locations onsite can be found in Appendix D. Sabina will post these maps at every operating site.

5.2. SPILL KITS

Table 1. Location of Spill Kits.

Goose Exploration Camp	Marine Laydown Area	Communities
Tank Farm	Shoreline Pad	Kingoak*
Drummed Fuel Storage	Freight Storage Pad	Umigmaktok*
Generator Buildings	Generator	
Coreshack	Camp Location	
Drum Crusher	Temporary AN and Fuel Storage	
Incinerator	Construction Laydown Pad	
Helipad Area	Mechanics Shop	
Dock	Quarry Area	
Each Diamond Drill		
South Quonset		
Shop North Quonset		

**will include standard spill kit and nuisance kit (or similar)*

Table 2. Spill Kit Contents.

Quantity	Item(s)
1	45 gal, 16 Gauge Open Top Drum, c/w Bolting Ring & Gasket
20	Short Putty Epoxy Sticks
1	48” x 48” x 1/16” Neoprene Pad (Drain Stop)
1	Splash Protective Goggles
1	Pkg. - Polyethylene Disposable Bags (5 ml) 10 per Package
1	Shovel (Spark Proof)
1	Case T-123” x 10’ Absorbent Boom, 4-Booms/Case;
1	Pkg. – Universal absorbent Mats, 16 ½” x 20”, 100 Mats per Package
1	Roll – Oil only absorbent mats 150’ x 33”
1	16’ Aluminum Boat (at MLA only)

** Drill rigs are equipped with a roll of absorbent mat for minor spills. Other appropriate equipment for spill response (PPE, shovel, bags) is typically already located at the drill for general use.*

5.3. MOBILE RESPONSE UNIT

A mobile Environmental Response Unit is available to Sabina from a major fuel supplier (Shell) in Yellowknife or Cambridge Bay. This unit can be transported to the site from Cambridge Bay in less than three hours weather permitting.

6. Spill Response Procedure

A spill is defined as the discharge of a hazardous product out of its containment and into the environment. Potential hazards to humans, vegetation, water resources, fish, and wildlife vary in severity, depending on several factors including nature of the material, quantity spilled, location, and season. Fuel is the main product that may be spilled and therefore spill response procedures focus on this hazardous material. Other chemicals that may be spilled include sewage water, and small quantities of lubricants and oils.

All site personnel are briefed on the procedures to be followed to report a spill and initiate spill response. The first person to notice a spill must take the following steps:

- Immediately warn other personnel working near the spill area.
- Evacuate the area if the health and safety of personnel is threatened.
- Notify their direct supervisor or Site Superintendent, who will initiate the spill response operations.
- In the absence of danger, and before the spill response team arrives at the scene, take any safe and reasonable measure to stop, contain and identify the nature of the spill.

The following details the steps to be taken in the event of a spill. Steps are listed in order of importance; however, circumstances and conditions may alter the order of these steps to meet a specific situation.

6.1. SOURCE CONTROL

Reduce or stop the flow of product without endangering anyone. This may involve very simple actions such as turning off a pump, closing a valve, sealing a puncture hole with almost anything handy (e.g., a rag, a piece of wood, tape, etc.), raising a leaky or discharging hose at a level higher than the product level inside the tank, or transferring fuel from leaking containers.

6.2. CONTROL OF FREE PRODUCT

Prevent or limit the spread of the spilled material. Accumulate/concentrate spilled product in an area to facilitate recovery. Barriers positioned down-gradient of the spill will slow or stop the progression of the spill. Barriers can consist of absorbent booms, dykes, berms, or trenches (dug in the ground or in ice).

6.3. PROTECTION

Evaluate the potential dangers of the spill in order to protect sensitive ecosystems and natural resources. Block or divert the spilled material away from sensitive receptors. This can also be achieved by using various types of barriers.

6.4. CLEANUP THE SPILL

Recover and containerize as much free product as possible. Recover and containerize/treat contaminated soil, water, and snow. Pressure-wash contaminated bedrock surfaces, shorelines, ice and recover as much as possible oily water for containerization and/or treatment.

6.5. CLEAN REPORT THE SPILL

Provide basic information such as date and time of the spill, type and amount of product discharged, photographic records, location and approximate size of the spill, actions already taken to stop and contain the spill, meteorological conditions and any perceived threat to human health or the environment.

6.6. RESPONSE BY SPILL LOCATION

6.6.1. Spills on Land

Response to spills on land will include the general procedures previously detailed. The main spill control techniques involve the use of two types of barriers: dykes and trenches. Barriers should be placed down-gradient (down-slope) from the source of the spill, and as close as possible to the source of the spill. Barriers slow the progression of the fuel and also serve as containment to allow for recovery.

Depending on the volume spilled, the site of the spill as well as available material, a dyke may be built with soil, booms, lumber, snow, etc. A plastic liner should be placed at the foot of and over the dykes to protect the underlying soil or other material and to facilitate recovery of the fuel. Construct dykes in such a way as to accumulate a thick layer of free product in a single area (V shaped or U shaped).

Trenches are useful in the presence of permeable soil and when the spilled fuel is migrating below the ground surface. A plastic liner should be placed on the down-gradient edge of the trench to protect the underlying soil. Liners should not be placed at the bottom of the trench to allow water to continue flowing underneath the layer of floating oil.

The use of large quantities of absorbent materials to recover important volumes of fuel should be avoided. Large volumes of free-product should be recovered, as much as possible, by using vacuums and pumps, and containerized. Mixtures of water and fuel may be processed through an oil-water separator. Absorbent sheets should be used to soak up residual fuel on water, on the ground (soil and rock), and on vegetation.

6.6.2. Spills on Water

Response to spills on water includes the general procedures previously detailed. Various containment, diversion and recovery techniques are discussed in the following sections. The following elements must be taken into consideration when conducting response operations:

- Type of waterbody or water course (lake, ocean, stream, river).
- Water depth and surface area.
- Wind speed and direction.
- Resonance and range of tides.
- Type of shoreline.
- Seasonal considerations (open-water, freeze-up, break-up, frozen).

Containment of an oil slick on the ocean requires the deployment of mobile floating booms to intercept, control, contain and concentrate (i.e., increase thickness) the floating oil. One end of the boom is anchored to shore while the other is towed by a boat or other means and used to circle the oil slick and return it close to shore for recovery using a skimmer. Reducing the surface area of the slick increases its

thickness and thereby improves recovery. Mechanical recovery equipment (i.e., skimmers and oil/water separators) will be mobilized to site if required.

If oil is spilled in a lake it may not be possible to deploy booms using a boat. In this case, measures are taken to protect sensitive and accessible shoreline. The oil slick is monitored to determine the direction of migration. In the absence of strong winds the oil will likely flow towards the discharge of the lake. Measures are taken to block and concentrate the oil slick at the lake discharge using booms where it will subsequently be recovered using a portable skimmer, a vacuum, or sorbent materials.

In small slowly-flowing rivers, streams, channels, inlets or ditches, inverted weirs (i.e., siphon dams) is used to stop and concentrate moving oil for collection while allowing water to continue to flow unimpeded. In the case of floating oil, in a stream, heading for a culvert (i.e., at a road crossing) a culvert block is used to stop and concentrate moving oil for collection while allowing water to continue to flow unimpeded. In both cases oil will then be recovered using a portable skimmer or sorbent materials.

In the case of spills in larger rivers, with fast moving currents, diversion booming is used to direct the oil slick ashore for recovery. Single or multiple booms (i.e., cascading) may be used for diversion. Typically, the booms are anchored across the river at an angle. The angle will depend on the current velocity. Choosing a section of a river that is both wider and shallower makes boom deployment easier. Diversion booming may also be used to direct an oil slick away from a sensitive area to be protected.

For development works, spills in the marine environment with be managed in accordance with the Oil Pollution Emergency Plan (OPEP) and the Shipboard Oil Pollution Emergency Plan (SOPEP) required by Transport Canada.

6.6.3. Spills on Snow and Ice

In general, snow and ice will slow the movement of hydrocarbons. The presence of snow may also hide the oil slick and make it more difficult to follow its progression. Snow is generally a good natural sorbent, as hydrocarbons have a tendency to be soaked up by snow through capillary action. However, the use of snow as a sorbent material is to be limited as much as possible. Snow and frozen ground also prevent hydrocarbons from migrating down into soil or at least slow the migration process. Ice prevents seepage of fuel into the water.

Response to spills on snow and ice includes the general procedures previously detailed. Most response procedures for spills on land may be used for spills on snow and ice. The use of dykes (i.e., compacted snow berms lined with plastic sheeting) or trenches (dug in ice) slow the progression of the fuel and also serve as containment to allow recovery of the fuel. Free-product is recovered by using a vacuum, a pump, or sorbent materials. Contaminated snow and ice is scraped up manually or using heavy equipment depending on volumes. The contaminated snow and ice is placed in containers or within plastic lined berms on land. If required, a contaminated snow storage site is to be located in close proximity to one of the four (4) main work sites to facilitate inspection and monitoring, in an area which is still easily accessible once it is time to remove the snow (i.e., spring or summer), and at least 30 m away from any body of water or ditch. Once enough snow has melted, the oily water is removed from the storage and processed through an oil-water separator that would be mobilized to site. Hydrocarbons recovered will be burned in the camp incinerator or shipped off-site for processing.

6.7. RESPONSE BY MATERIAL SPILLED

6.7.1. Fuel

Detection of leaks will be using two methods - a fuel inventory reconciliation and inspection. A weekly reconciliation of storage volumes will be completed and a spill response will be initiated in the event of any unexplained loss over five or more weeks.

Weekly inspections will be conducted to ensure either there has not been a leak or that the conditions of the area could result in a leak. These inspections will include the fuel drums and storage containers, secondary containment sumps and associated spill containment devices, any pumps and product-handling equipment, and an overfill protection devices. These inspections will be recorded to include who completed the inspections, areas included in the visual inspection and any deficiencies noted.

Fuel spills, leaks at storage facilities or vehicle accidents will be handled by following these steps:

- Identify the source of the leak or spill.
- Contact the Environmental Coordinator/Site Superintendent.
- Stop leaks from tank or barrel by.
- Turning off valves.
- Utilizing patching kits to seal leaks.
- Placing plastic sheeting at the foot of the tank or barrel to prevent seepage into the ground.
- Contain the spill and the source if possible.
- Take photographs of the spill site before and after the cleanup.

Small spills will be cleaned up by removing the contaminated soil and storing it in empty 205 L drums for backhaul and disposal at an approved hazardous waste disposal site. Should a large spill occur, cleanup and disposal efforts will be coordinated as necessary with the appropriate authorities and agencies.

Further information on the handling of fuel spills is detailed in Appendix 2.

6.7.2. Domestic Sewage, Solid Waste, and Contact Water

Any problems with the incinerator or other waste disposal mechanism will be immediately reported to the Site Superintendent.

In the event of a power failure, the stand by generator will be put into operation as soon as possible. Similarly, in the case of a pump failure, the backup pump will be put on-line. Any greywater drainage problems will be addressed as quickly as possible to minimize the chance of a spill. As necessary appropriate safety equipment and personal protective clothing will be available to site personnel.

6.7.3. Chemical

Assess the hazard of the spilled material by referring to the relevant MSDS sheet. Each response will vary based on the material. If the chemical is hazardous, ensure personnel protective equipment is utilized (latex gloves, eye protection, etc.) before approaching the spill. As chemicals are only used in extremely small quantities on-site use absorbent mats to soak up spilled liquids and place in appropriate container for treatment and/or disposal.

6.8. RESPONSE TO A FIRE

Various products, including fuel, may be flammable under certain circumstances. It is important to ensure that the spill does not present a risk of fire prior to commencing the cleanup. If a fire does break out refer to relevant site firefighting procedures.

6.9. DISPOSAL

Appropriate disposal, as directed by the Environmental Manager, for any recovered product and contaminated soil, water, or absorbent cleanup material is regulated and must be authorized by the agency investigating the incident. Obtain approval from all appropriate government agencies before disposal. A hazardous waste generator number has been acquired and used by the expeditor when disposing of camp waste.

Fuel contaminated soil can be remediated at camp through incineration or alternatively, the contaminated soil can be flown out to Yellowknife for disposal in an approved disposal/treatment site.

Any non-reusable recovered product, contaminated soil and cleanup material, which cannot be incinerated, will be stored in containers and returned to camp prior to disposal.

7. Spill Potential Analysis

7.1. CAMPS

7.1.1. Fuel

Fuel spills could potentially occur from:

- Fuel storage containment (tanks, barrels) leaks.
- Spills during drum transport from aircraft to fuel storage area.
- Spills from vehicles or equipment as a result of accidents.
- Spills during fuel transfer from barrels to equipment or heaters.
- Spills during transport from barge to fuel storage area.
- Spills during marine transport.

Spills occurring during fuel handling, transfer, or storage operations will be minimized by:

- Secondary containment and/or drip trays.
- Proper storage of barrels.
- Inspections of the storage facilities and barrels.
- Inventory tracking.
- Staff training in proper fuel handling procedures.
- Spill response training for personnel associated with fuel handling.
- Immediate cleanup of minor spills.
- Enclosing spigots on fuel containers with absorbent mat to collect any slow drips.
- Fuel line walkers will be used to monitor the fittings etc. during fuel transfers
- Implementation of approved OPEP and SOPEP for transport in marine waters.

The potential for spills affecting surface waters is low, as fuel storage and transfer points are located away from watercourses and lakes. Close inspection of fuel transfer activities will be undertaken during all times while fuel is being pumped/transferred to equipment. Secondary containment will be used at all refuelling points and storage areas.

7.1.2. Domestic Sewage and Solid Waste

Waste from the kitchen and Pacto systems are carried to the incinerator in a small trailer, with virtually no risk of spillage. The greywater lines are routinely inspected for leaks and repaired as necessary. The screens at the greywater sump are cleaned of debris daily.

7.1.3. Solid Waste

Failures may occur in the handling of solid waste through the following situations:

- Incinerator at Goose Exploration Camp fails.
- Accidental damage to the incinerator and it components, or the heaters and/or their fuel supplies.
- Mechanical breakdown.
- Improper maintenance.

Visual inspection of the incinerator and its combustion products will be carried out frequently, typically in the normal course of operation. The incinerator will be operated according to the manufacturer's instructions.

7.1.4. Chemicals

Any chemicals brought on-site are stored in manufacturers' approved packaging. Although unlikely, leaks may occur resulting in minor spills of chemical product in storage. It is more likely a leak will occur during the transfer of chemicals or from accidental failure of containers.

Sabina provides training to its staff in product handling and inspection procedures, which we feel, will result in reduced occurrences of chemical spills.

7.2. OVERLAND TRANSPORT

The following table identifies possible incidents which may occur along the winter and all-weather road, the consequences of that incident and the preventative measures to be implemented.

Table 3. Summary of Potential Incidents and Preventative Measures along Transportation Corridors

Incident	Description	Consequences	Preventative Measures
Refuelling of vehicles	Refuelling hose could break, spring a leak, overfilling of equipment tank, spillage from gas storage tank	Puddles of fuel over limited area Hose breaks at equipment and sprays a large amount of fuel over a larger area "slick" flows steadily from equipment	All refuelling will occur in area 30m from waterways in designated areas Personnel will be aware of emergency shut-off valves and trained in spills response Spill Kit available Refuelling occur within containment and/or absorbent material in place
Vehicle storage and operation	Vehicles could leak fuel while in operation or during a stop along route.	Puddles of fuel over limited area to the entire contents of a tank being discharged.	Vehicles will stop 31 m from waterways Vehicles parked on ice will have absorbent material placed underneath Personnel will be trained in spills response Spill Kit available
Fuel containers leaking	Fuel being brought to the vehicles could leak fuel while in operation or during a stop along route.	Puddles of fuel over limited area to the entire contents of a tank being discharged.	Regular visual inspection will occur to ensure tanks are not leaking Personnel will be trained in spills response Spill Kit available

(continued)

Table 3. Summary of Potential Incidents and Preventative Measures along Transportation Corridors (completed)

Incident	Description	Consequences	Preventative Measures
Vehicle accident	Accident on road that involves equipment going off road/overturning	This worst case scenario could result in a tank of fuel and any materials being transported spilling entire contents over a large area.	Safe road corridor will flagged Speed limits will be in effect Transportation of Dangerous Goods manifest if necessary Coordination and communication between the cat-haul and camps will be maintained Camp personnel will be ready to mobilize in case of accident Spill kit available with cat-haul and on-site
Temporary fuel storage leakage and/or spill	Fuel caches leak fuel or due to accident contents are spilled	Puddles of fuel over limited area Storage container breaks and fuel spreads over a larger area	All storage will occur in area 30m from waterways Secondary containment berms will be used for fuel caches Personnel will be aware of emergency shut-off valves and trained in spills response Spill Kit available Regular monitoring and inventory tracking will occur at these remote/temporary fuel storage areas
Calcium Chloride spill	Bags of salt could be torn and spilled in temporary storage area or in transport	Tears and bag breakages could lead to salt spread over limited area Bags could break in a manner that salt is spread over a larger area	Personnel will be trained in proper material handling and transport methods Salt will be stored and transported in 50lb bags on pallets wrapped in plastic Secondary containment will be used at temporary storage locations Spill kits and equipment available.

7.3. FIRE PREVENTION

The most serious spill incident would involve fire and a hydrocarbon-based fuel source. To minimize the risk of fire, **No Smoking** and **Flammable** signs will be posted as needed at storage areas and with the cat-haul train along with a dry chemical fire extinguisher. Workers will be trained in the use of the fire extinguisher and be instructed of the risk caused by electrical and open flame fire hazards near fuel.

8. Reporting Procedures

All spills are to be reported to the Site Superintendent or their designated representative. It is their responsibility to notify headquarters staff and external parties as outlined in the roles and responsibilities of this plan.

An internal log of spills, no matter how small, is to be kept and maintained by the Site Superintendent. Each record will include date, location, material spilled, volume, reason for release, any negative impact, status of cleanup, and corrective actions taken. Photo's (before, during and after cleanup) shall also be taken of all significant spills. To assist with internal tracking a Sabina Spill Form is included in Appendix C.

Reportable spills, as identified in this plan, are to be externally reported to the NWT/Nunavut Spill Response Line. The Site Superintendent will ensure spills are reported externally as required. The Spill response form (Appendix C) is to be completed for all externally reported spills and forwarded to the NWT/Nunavut Spill Response Centre within the required 24 hour reporting period. The Manager, Logistics and TS, or their designate, will notify Sabina Headquarter senior management of any reportable spills as listed below.

Any spill, or incident that may likely result in a spill, of an amount equal to or greater than the amount listed in the table below shall be promptly externally reported. Spills adjacent to or into a surface water or ground water access shall be externally reported regardless of quantity.

Spills within secondary containment will be reported and included in the internal log. In the situation that the spill within the containment is above the thresholds noted below, an external report to the NWT/Nunavut Spills will be submitted if the spill exceeds 40% capacity of the secondary containment.

Notification of spills within the marine environment will also be provided to community representatives of Kingaok and Omingmaktok.

Table 4. External Reporting Volumes

TDGA Class	Description of Contaminant	Amount Spilled
1	Explosives	Any amount
2.1	Compressed gas (flammable)	Any amount of gas from containers with a capacity greater than 100 litres
2.2	Compressed gas (non-corrosive, non-flammable)	Any amount of gas from containers with a capacity greater than 100 litres
2.3	Compressed gas (toxic)	Any amount
2.4	Compressed gas (corrosive)	Any amount
3.1, 3.2, 3.3	Flammable liquid	100 litres
4.1	Flammable solid	25 kg
4.2	Spontaneously combustible solids	25 kg
4.3	Water reactant solids	25 kg
5.1	Oxidizing substances	50 litres or 50 kg
5.2	Organic Peroxides	1 litre or 1 kg
6.1	Poisonous substances	5 litres or 5 kg
6.2	Infectious substances	Any amount
7	Radioactive	Any amount
8	Corrosive substances	5 litres or 5 kg
9.1 (in part)	Miscellaneous products or substances,	50 litres or 50 kg
9.2	Environmentally hazardous	1 litre or 1 kg
9.3	Dangerous wastes	5 litres or 5 kg
9.1 (in part)	PCB mixtures of 5 or more parts per million	0.5 litres or 0.5 kg
None	Other contaminants	100 litres or 100 kg

Appendix A. Sabina Spill Response Team

(will be reviewed and updated on an as-needed basis)

Sabina Contacts:

Environmental Engineer	Merle Keefe	(604) 998-4175
Exploration Manager	James Maxwell	(604) 998-4175
Site Superintendent - Goose	Rob Davidson	(867) 975-3318
Site Superintendent - MLA	Jaymes Dircks	(867) 681-0156
VP Sustainability	Matthew Pickard	(604) 998-4175
Environmental Coordinator	Mitchell Kearney	(867) 681-0156

Additional assistance may be obtained, as necessary, from the following organizations:

Det'on Cho Logistics	(867) 873-6970
Shell Canada, Mobile Environmental Response	(867) 874-2562
Kitnuna	(867) 983-7500
Nuna Logistics Ltd.	(866) 817-0924
Dupont (Fuel Dye)	(905) 821-5660
Frontier Mining (Sorbents)	(867) 920-7617
Acklands (sorbents)	(867) 873-4100 (867) 920-5359

Key Government Contacts:

NWT/NU 24hr Spill Report Line		Fax: 867-873-6924 Email: spills@gov.nt.ca
Nunavut Water Board	Stephanie Autut, Exec. Director Karén Kharatyan, Technical Advisor	(867) 360-6338
Kitikmeot Inuit Association	John Roesch, Senior Project Office	(867) 983-2458
Environment and Climate Change Canada	Craig Broome, Manager of Enforcement Wade Romanko, Env. Emergencies Officer	(867) 669-4730 (867) 669-4736
Indigenous and Northern Affairs Canada	Primary: Andrew Keim, Manager of Field Operations Eva Paul, Water Resources Officer Baba Pederson, Resource Management Officer	T: (867) 975-4295 F: (867) 975-6445 (867) 982-4308 (867) 975-4296
Government of Nunavut Environmental Protection	Robert Eno, Director Environmental Protection	(867) 975-7729
Department of Fisheries and Oceans	Suzanne Erkidjuk, Area Admin Clerk	(867) 979-8000
RCMP (Yellowknife)		(867) 669-1111
RCMP (Cambridge Bay)		(867) 983-2111

Appendix B. Procedure In The Event Of A Spill

Priority 1 – Identify spill source and assess hazard

- Ensure safety of all people in the area.
- Check for fire and explosion risk:
    - Extinguish all ignition sources in the area
- If unsafe, raise alarm and close off affected area

Priority 2 – Stop flow of spill

- Stop flow at source of spill
- Contain spill utilizing absorbent pads, drip pans, or other secondary containment berms to catch any slow or unexpected leaks.
- Attempt to limit the spread of the spill. Prevent movement using sorbent material and berms to form a barrier
- If the spill occurs on ice, attempts should be made to stop the spill from reaching ice-free ground.

Priority 3 – Notify direct Supervisor or Site Superintendent

- Provide as much information as possible about the source, material, amount, fire risk, injuries etc.

Priority 4 – Spill Containment

- For all spills, use absorbents to contain and soak up the fuel
- Prevent spread of fuel by using booms and berms
- Response operations should not be commenced in the affected area until it is safe.

Priority 5 – Spill Recovery and Cleanup

- Recover as much of the spill as possible using absorbent materials and/or digging up the affected area if applicable.
- Store any contaminated or recovered material in secondary containment
- Disposal should be by approved methods and facilities as per the Site Superintendent instructions.
- Ensure spill is recorded in Environmental Incident Log

Appendix C. NWT/NU Spill Report and Sabina Internal Spill Report

NT-NU SPILL REPORT

OIL, GASOLINE, CHEMICALS AND OTHER HAZARDOUS MATERIALS

NT-NU 24-HOUR SPILL REPORT LINE
TEL: (867) 920-8130
FAX: (867) 873-6924
EMAIL: spills@gov.nt.ca

REPORT LINE USE ONLY

A	REPORT DATE: MONTH – DAY – YEAR	REPORT TIME	☐ ORIGINAL SPILL REPORT, OR ☐ UPDATE # _____ TO THE ORIGINAL SPILL REPORT	REPORT NUMBER ____-_____
B	OCCURRENCE DATE: MONTH – DAY – YEAR	OCCURRENCE TIME		

C	LAND USE PERMIT NUMBER (IF APPLICABLE)	WATER LICENCE NUMBER (IF APPLICABLE)
D	GEOGRAPHIC PLACE NAME OR DISTANCE AND DIRECTION FROM NAMED LOCATION	REGION ☐ NWT ☐ NUNAVUT ☐ ADJACENT JURISDICTION OR OCEAN
E	LATITUDE DEGREES MINUTES SECONDS	LONGITUDE DEGREES MINUTES SECONDS

F	RESPONSIBLE PARTY OR VESSEL NAME	RESPONSIBLE PARTY ADDRESS OR OFFICE LOCATION	
G	ANY CONTRACTOR INVOLVED	CONTRACTOR ADDRESS OR OFFICE LOCATION	
H	PRODUCT SPILLED	QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES	U.N. NUMBER
	SECOND PRODUCT SPILLED (IF APPLICABLE)	QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES	U.N. NUMBER
I	SPILL SOURCE	SPILL CAUSE	AREA OF CONTAMINATION IN SQUARE METRES
J	FACTORS AFFECTING SPILL OR RECOVERY	DESCRIBE ANY ASSISTANCE REQUIRED	HAZARDS TO PERSONS, PROPERTY OR ENVIRONMENT
K	ADDITIONAL INFORMATION, COMMENTS, ACTIONS PROPOSED OR TAKEN TO CONTAIN, RECOVER OR DISPOSE OF SPILLED PRODUCT AND CONTAMINATED MATERIALS		

L	REPORTED TO SPILL LINE BY	POSITION	EMPLOYER	LOCATION CALLING FROM	TELEPHONE
M	ANY ALTERNATE CONTACT	POSITION	EMPLOYER	ALTERNATE CONTACT LOCATION	ALTERNATE TELEPHONE

REPORT LINE USE ONLY

N	RECEIVED AT SPILL LINE BY	POSITION STATION OPERATOR	EMPLOYER	LOCATION CALLED YELLOWKNIFE, NT	REPORT LINE NUMBER (867) 920-8130

LEAD AGENCY ☐ EC ☐ CCG ☐ GNWT ☐ GN ☐ ILA ☐ INAC ☐ NEB ☐ TC | SIGNIFICANCE ☐ MINOR ☐ MAJOR ☐ UNKNOWN | FILE STATUS ☐ OPEN ☐ CLOSED

AGENCY	CONTACT NAME	CONTACT TIME	REMARKS
LEAD AGENCY			
FIRST SUPPORT AGENCY			
SECOND SUPPORT AGENCY			
THIRD SUPPORT AGENCY			

SABINA INTERNAL SPILL REPORT FORM

This form is to be used for internal documentation of spills of any petroleum product, chemical, ethylene glycol (antifreeze), or other hazardous material. See recent Spill Contingency Plan for reporting thresholds and structure. Once complete file with the Operations Superintendent.

***Report Date and Time*:**	***Spill Date and Time*:** ☐ Spill occurred ☐ Spill observed
***Spill Location*:** ☐ Goose ☐ Other (e.g. Drill, Boulder Pond) ☐ George	***Describe Location*:**
***Coordinates (Lat/Long or UTM)*:**	

***Product(s) Spilled*:**	Jet fuel	Diesel (P50)	Gasoline	AvGas	Oil (type)	Antifreeze	Other (describe)
***Quantity (L or kg)*:**							

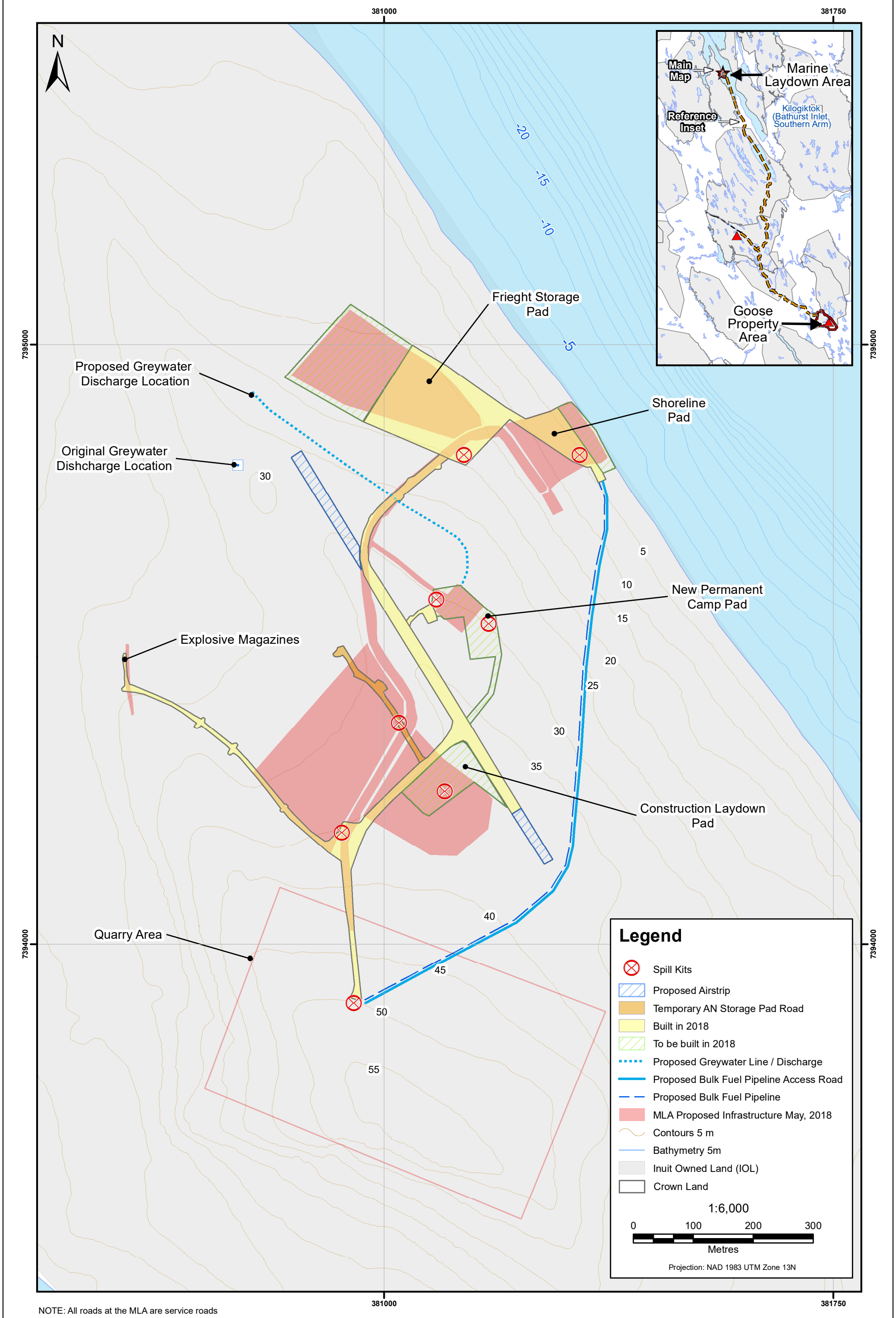
Personnel Involved:	☐ Sabina	☐ Contractor	☐ Visitor	☐ Other

***Cause of Spill*:**
***Containment/Cleanup Measures Taken*:**
***Factors Affecting Spill or Recovery (weather, snow, ground conditions, etc.)*:**
***Additional Action Required*:**
***Additional Comments*:**

	Name	***Employer***	***Signature***
***Reported by*:**			
***Reported to*:**			

Appendix D. Site Spill Kit Location Maps

GIS # BR_MLA_ENV_SPLKTS_June2018 W:\BackRiver\04_Exploration\BackRiverRegion\GIS_Products\ESRI_MXD\Water_Permitting\Spill Kits\BR_MLA_ENV_SPLKTS_June2018.mxd June 27 2018



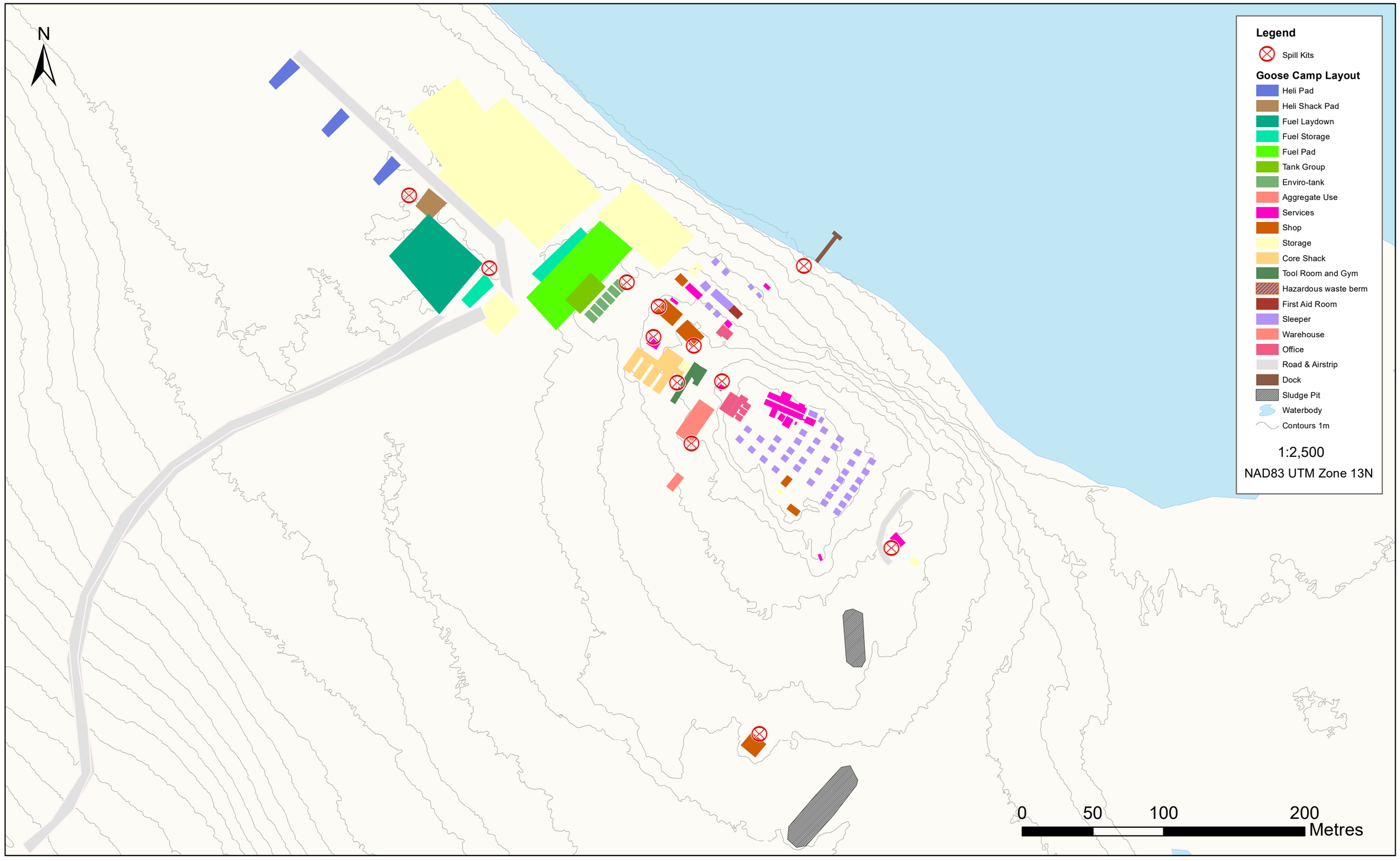
NOTE: All roads at the MLA are service roads

Sabina GOLD & SILVER CORP.

Marine Laydown Area
Potential Development Area and Layout
Spill Kit Locations June 2018

BR_GSE_ENV_SPLKTS_June2018

W:\BackRiver\04_Exploration\BackRiverRegion\GIS_Products\ESRI_MXD\Water_Permitting\Spill Kits\BR_GSE_ENV_SPLKTS_June2018.mxd



Sabina
GOLD & SILVER CORP.

Goose Exploration Camp
Spill Kit Locations June 2018

ATTACHMENT 8 - ABANDONMENT AND RESTORATION PLAN GEORGE CAMP AND EXPLORATION PROJECT

Back River Project

Abandonment and Restoration Plan

George Camp and Exploration Project

JANUARY 2019

Table of Contents

1.0 INTRODUCTION

1.1 General

Sabina Gold & Silver Corp. (Sabina) is actively exploring the Back River property mineral rights (encompassing the primary exploration camp at Goose Lake, as well as a satellite camp at George Lake and unoccupied claim groups at Boot Lake, Boulder Pond, Wishbone, and Del Lake). Advanced exploration programs have been carried out in previous years with similar activities anticipated in 2010 and beyond as Sabina continues to advance the project.

Sabina is also responsible for maintaining all permits and claims required for the project in good standing. The Back River Project is covered by the following land use licenses:

Table 1. List of licenses and permits applicable to the Back River Project

Authorization No.	Expiry (YYYY-MM-DD)	Agency	Description
KTCL-18D001	2038-04-20	KIA	Commercial Lease - Goose
KTCL-18D002	2038-04-20	KIA	Commercial Lease - MLA
KTCL-18D003	2038-04-20	KIA	Commercial Lease – Winter Road
KTAEL-18C001	2023-04-20	KIA	Advanced Exploration Lease – George
LUL-XX	5 years from Effective Date	KIA	Land Use Licence as per KIA Framework Agreement
KTL312C004	2018-12-12	KIA	Wishbone-Malley Exploration Activities
N2018F0021	2023-10-29	CIRNAC	CAT Train Beechy Lake Area
N2017F0016	2022-07-20	CIRNAC	CAT Train connecting Bathurst Inlet - Back River Project
N2012C0003	2019-02-06	CIRNAC	Wishbone-Malley Exploration Activities
N2016C0011	2021-10-26	CIRNAC	Back River Exploration Activities
N2018F0017	2023-10-11	CIRNAC	Winter Ice Road Back River Project
Lease No. 76J/12-7-2	2048-08-14	CIRNAC	Marine environment land lease – adjacent to MLA
2BE-GOO1520	2020-02-18	NWB	Goose Water Licence (Type B)
2BE-GEO1520	2020-05-29	NWB	George Water Licence (Type B)
2BE-MLL1722	2022-06-29	NWB	Wishbone-Malley Water Licence (Type B)
2BC-BRP1819	2019-04-30	NWB	Back River Project Development Works Water Licence (Type B)
18-HCAA-00185	-	DFO	Letter of Authorization – Gander Culvert
18-HCAA-00971	-	DFO	Letter of Authorization – MLA
04 009 19R-M	2019-12-31	NRI	Back River Project Scientific Research License
2012-600767-002	-	TC	Navigation Protection Act – MLA Discharge Pipeline Permission Notice
2012-600767-003	-	TC	Navigation Protection Act – MLA Intake Pipeline Permission Notice
PC No. 007	-	NIRB	Back River Project NIRB Project Certificate

Operating and managing an exploration project on tundra requires a lot of effort from all parties involved. The area is environmentally sensitive and all aspects of exploration because of our activities, products, and services will be risk assessed with management protocols developed, implemented, and communicated to our employees, interested parties, and suppliers to eliminate or minimize any negative impacts to the receiving environment.

The George Lake exploration camp (George camp) was not operational in 2018; only the Goose Lake exploration camp (Goose camp) was open. During the 2018 Goose camp opening, Sabina personnel visited George camp several times throughout 2018 to confirm all camp infrastructure including containment remained in good condition, which was confirmed.

The last active program at George camp occurred during the 2013 season, which included camp improvements to support a 60-person camp and exploration drill program. Historically during active operations at George camp, crew, equipment, supplies were flown into Goose camp from Yellowknife via Twin Otter or similar aircraft. Equipment, personnel, and supplies were moved between Goose camp and George camp by helicopter, or by the 750-m airstrip. At the end of the season the crew was demobilized back to Yellowknife using float-equipped aircraft or the all-weather airstrip in camp. Drill equipment and supplies may remain at the project area for use during subsequent exploration seasons. In the future, these same methods would be employed to move crew, equipment, and supplies into George camp.

Sabina will implement this Abandonment and Restoration Plan (ARP or the Plan) when scheduled and will continue to look for ways to minimize or eliminate negative impacts to the environment as a result of its activities, products, and services at Sabina's Back River properties.

1.2 Sabina Sustainable Development Policy

Sabina Gold & Silver Corp. regards itself as a responsible explorer and mineral developer. We are committed to fostering sustainable development throughout all stages of our activities. We constantly strive to conduct our operations in a manner that balances the social, economic, cultural and environmental needs of the communities in which we operate.

To build on this commitment, Sabina will:

- Meet or strive to exceed all relevant legislated sustainable development requirements in the regions where we work.
- Ensure appropriate personnel, resources and training is made available to implement our sustainable development objectives.
- Establish clear lines of responsibility and accountability throughout the company to meet these objectives.
- Implement proven management systems and procedures to facilitate our sustainable development objectives. A Priority will be placed on developing and implementing management structures related to the environment, health and safety, emergency response and stakeholder engagement.
- Act as responsible stewards of the environment for both current and future

generations. We will make use of appropriate assessment methodologies, technologies and controls to minimize environmental risks throughout all stages of mineral development.
- Work closely with local communities and project stakeholders to understand their needs, address their concerns and provide project-related benefits to create win-win relationships. Our goal is to earn and maintain a social licence to operate at all our operations while building partnerships.
- Pursue economically feasible projects in order to generate shareholder profitability and support long-term positive socio-economic development in the regions where we work.
- Utilize a precautionary approach as it applies to potential effects from our activities. Work with employees, contractors and stakeholders to promote a culture of open and meaningful dialogue to ensure that any k own or suspected departures from established protocols are reported to management in a timely manner.
- Regularly review this policy to ensure it is consistent with Sabina's current activities and the most recent legislation.
- Continually improve our performance and contributions to sustainable development including pollution prevention, waste minimization and resource consumption.
- Implement programs at each of our operations to monitor and report compliance and proactively address potential deficiencies in our policies and procedures.

The objectives of our sustainable development policy cannot be accomplished without the active involvement and commitment of many dedicated individuals. As such, we will regularly communicate this policy and its outcomes to our employees, contractors and relevant stakeholders. Together, we can foster a culture of sustainable development at Sabina.

1.3 Legal Requirement

Under the terms of the Kitikmeot Inuit Association (KIA) Land Use Licenses and the Nunavut Water Board (NWB) Water Use Licenses, Sabina is obligated to rehabilitate the areas used to its previous standard of human utilization and natural productivity.

1.4 Site Location and Description

The Back River exploration project is located in the Kitikmeot, south of Bathurst Inlet within the Slave Structural Province. It is approximately 525 kilometres northeast of Yellowknife and 400 kilometres south of Cambridge Bay, NU. The project area is within the zone of continuous permafrost, and is represented on National Topographic System 1:250,000 scale map sheets 76F, 76G, 76J, and 76K. The primary base of operations is at Goose camp located near Goose Lake (Figure 1), supported by a satellite camp near George Lake (Figures 1 and 2) used for resupply, staging, drill support, and emergencies. Coordinates for the camps are as follows:

Goose Camp: 65°32' north 106°25' west
George Camp: 65°55' north 107°27' west

The George camp is located on the western shore of George Lake and consists of an approximate 60-

person satellite camp. These facilities are located on the eastern side of an esker which has been partially leveled for use as an airstrip.

The lakeshore is approximately 50 m toward the east of the camp buildings. A lined, bermed bulk fuel storage area is located approximately 100 m off the northwest end of the airstrip. Airstrip substrate material consists of bedrock and esker material (glacially-derived sand and gravel).

1.5 Scope of Reporting

This Abandonment and Restoration Plan has been written to meet the requirements of the Nunavut Water Board (NWB) licenses listed in Table 1 and applies to the George camp, operated under NWB Licence 2BE-GEO1520. Subject to annual review and revision, it will remain applicable throughout the duration of the NWB licenses or until a material change in the scope of the project occurs.

The current revision of the ARP has been prepared for on-going exploration activities. The Plan also takes into consideration the likelihood of premature camp closure due to:

- Sudden drop in gold prices which could make the project uneconomical;
- Drop in resource grade to a value lower than anticipated;
- Non-compliance to legislative requirements;
- Natural disasters;
- Force majeure;
- Change of ownership/operator.

In situations as such mentioned above, this plan provides the base strategy for anticipated tasks of restoring George camp in an event where exploration activity has ceased, either on a short term or a long term basis. The plan will be reviewed annually and updated with current information.

Section 1 of the Plan gives a brief account of the ownership of the property, the sustainable development policy, legal requirements, and a brief description of the camp. Section 2 outlines responsibilities for execution of the Plan. Section 3 outlines a brief time schedule for restoration activities after completion of each exploration program. A list of infrastructure at the George camp is compiled and a brief summary on the progressive restoration program is provided. Sections 4 and 5 of the Plan provide details of how each exploration aspect will be addressed, while the final section (Section 6) outlines when the next review of the Plan would be conducted.

2.0 RESPONSIBILITIES FOR THE PLAN

Senior personnel at the Back River Project (at the main camp at Goose Lake) are responsible for the implementation of this plan. However, every employee, contractor, and visitor arriving on the Back River Project site has a responsibility to ensure that they adhere to the Sabina sustainable development policy. The policy will be communicated to all employees, contractors, and visitors during their stay at Project in a formal site orientation program given by the Site Superintendent.

Contact information for key personnel is as follows, and will be updated on an as-needed basis. Currently, camp-based phone numbers are not available at this time:

- Vice President, Environment & Sustainability – Matthew Pickard
- Exploration Manager – James Maxwell
- Environmental Engineer – Merle Keefe

3.0 SCHEDULE FOR ABANDONMENT AND RESTORATION

For each exploration season, the closure of the Back River Project sites should take approximately 14-21 days to complete, allowing for variable weather conditions. As exploration activities vary from year to year and the end of the field season is difficult to predict months in advance, the restoration program will likely commence in the late summer and extend into the 4th quarter of the year. Since Goose camp is the main camp servicing outlying exploration areas, it would take the longest to shut down.

Outlying drill sites will take minimal time as their shut down requirements are much less. Other sites in the Back River Project area include the George camp and diamond drill sites. These would close down simultaneously with exploration as there is the proper support at this time (personnel, aircraft).

3.1 List of Infrastructure at George Camp

Table 2. George Camp Infrastructure and Equipment (December 2018; no change since 2013)

Category	Qty	Item Description
Buildings	10	14 x 16’ Weather haven structures, including sleeping quarters and office
	2	14 x 24' sidewall tents (1 recreation and 1 exercise)
	9	Structures linked together by enclosed corridor and includes sleeping quarters, kitchen, dry, office, and generator building
	2	14 x 18' drillers dry/office
	1	12 x 16' storage building
	2	10 x 8' helicopter storage units/office
	2	Core cutting and core logging shack (also connected by enclosed corridor)
	1	Quonset garage
	2	ATCO trailers (converted to dry)
	2	Generators (250kW & 300kW)
Other Infrastructure	2	75,000L double walled ULC approved envirotanks
	1	Lined, bermed area for fuel supplies
	1	Esker airstrip
	1	Solid waste laydown area
	1	Incinerator (1 building + incinerator)
Equipment	1	IT28G Loader + accessories
	2	277 Caterpillar Skidsteer
	1	Drum crusher (not set up)
	4	15,000L fuel sleighs (some tanks separated from sleighs)
	2	ATVs

	5	Snowmobiles (functional)
	1	D6 Caterpillar Dozer

The final inventory of fuel and drilling supplies remaining in the camp at closure (as of December, 2018) includes:

- Diesel – 88,090 litres of bulk diesel contained in the two Envirotanks;
- Jet A/B – 3 drums in secondary containment;
- Gasoline – 11 drums in secondary containment;
- Av Gas – 0 drums in secondary containment;
- Propane – 8 x 250-lb. cylinders;
- CaCl drilling salt – 0 bags; and
- Core trays – 0 trays.

3.2 Progressive Reclamation

Sabina has embarked on a program of progressive reclamation over the entire Back River project area. Progressive restoration will be ongoing throughout the exploration programs thereby reducing the need for a full-scale restoration program at the closure of each exploration phase. Ongoing significant restoration activities are described below.

3.2.1 Contaminated Area Reclamation

3.2.1.1 Recycle of Water Contaminated Fuel

Contaminated fuels are recycled primarily as fuel for the garbage incinerator or as fuel for the water heaters used in the drilling program. If present in sufficient quantities, contaminated fuel may be recycled for camp heating purposes. For water with minor amounts of hydrocarbons, an oil-water separator may be used and/or activated charcoal filters. As a last resort, it may be transported off the property for disposal at an appropriate facility.

3.2.1.2 Contaminated Top Soil

Spills are handled as per the Comprehensive Spill Contingency Plan. Enviromat is immediately applied to absorb spills of hydrocarbons, minimizing the amount of soil required to be removed. Remaining contaminated soils are removed and stored in barrels for transportation to permitted disposal sites.

3.2.2 Non-combustible Solid Waste

Solid waste including metal scraps, drill rods, household items, etc. are stored in an appropriate marshalling area for backhaul. The material is arranged in such a way that it can be easily removed from the property, and disposal will be appropriate to the material being removed, either to an approved disposal facility, metal recycler, or an approved designated landfill.

Ash from the incinerator is stored in empty 205-L drums for backhaul and disposal.

4.0 WINTER RESTORATION PLAN

The winter restoration plan is intended to cover short-term (seasonal) closure of the Back River Project. The tasks involved are important to the success of future exploration programs but require significantly less effort than the full restoration plan.

4.1 Buildings and Contents

All tents and building complexes will be secured for the winter. All the office equipment, household furniture, kitchen equipment, recreational equipment, and other mobile heavy equipment will be winterized and left secured on site. Any equipment not capable of withstanding the harsh winter conditions will be removed from site and stored in either Yellowknife or Vancouver.

4.2 Water Supply System

Water pumps, filtering systems, water lines, and any other equipment associated with the water supply system will be drained and winterized. The water pump shed will be secured.

4.3 Sewage System

The sewage system will be drained with no graywater remaining in the discharge pipe. Solid waste will be incinerated.

4.4 Waste Incinerator

The fuel supply for the incinerator is shut off using a series of valves. The fuel remains in an artificial berm in the double-walled tank adjacent to the incinerator throughout the winter. The area will be inspected for petroleum spills or contamination. If such is the case, the issue will be addressed as outlined in Section 3.2.1.2.

4.5 Electrical System

The generator and surrounding area will be inspected for signs of spills and remaining wastes such as oil and grease. If topsoil is contaminated, an attempt will be made to remove as much of the spill as possible with enviromat; remaining contaminated soil will be stored in empty drums for disposal at an approved hazardous waste facility. The generator will be drained of its fuel. Remaining waste fuel, oil, and grease will be stored in approved storage containers which are labelled for that usage and reused during summer operations. The generator will be winterized and the shed will be secured for winter. Electrical wires, plugs, and sockets will remain in their installed locations. All electrical cords temporarily connected to a building or machinery during summer work program will be unplugged, rolled, and stored in the workshop.

4.6 Camp Heating Systems

Any 205-L fuel barrel attached to respective tent or building will be secured within the secondary containment container. The remaining fuel in the line will be allowed to burn out. The lid of the containment container will be secured to prevent snow from filling up the designated containment area. All empty propane cylinders will be transported to Yellowknife for recycling.

4.7 Petroleum Products and Storage Facilities

An on-site fuel cache is of great importance during camp start-up in the late winter. Diesel fuel will be stored in the 2 double-walled envirotanks within the lined, bermed tank farm. Minimal quantities of diesel in barrels and any unused barrels of jet fuel will be stored within self-supporting artificial berms or in the tank farm berm. The barrel locations will be clearly marked to facilitate snow clearing activities during camp opening the following spring. The Site Superintendent will be responsible for determining the possible access to these fuel resources prior to the start of the next exploration program.

Empty drums at remote drill sites will be transported to the Goose camp, crushed, banded to pallets and either stored for future backhaul or transported to Yellowknife for disposal/recycling. This work is typically done progressively as fuel caches are no longer required or as drill setups are dismantled.

Fuel farm secondary containment area will be cleared of any debris. In the springtime, meltwater within the containment area will be tested for the parameters listed in Table 3. If the analytical data confirms that the water meets regulatory criteria (Table 3), the water will then be released onto the tundra in such a manner as to avoid direct entry to a surface water body. Residual water remaining after pump out as well as collected rainwater are allowed to evaporate over the summer and are unlikely to present a volume issue at camp shutdown in the fall.

Table 3. Regulatory guidelines for hydrocarbons in soils

Parameter	Maximum concentration of any Grab Sample (µg/L)
Benzene	370
Toluene	2
Ethylbenzene	90
Phenols	20
Oil and Grease	5000
pH	6 to 9 (pH units)

The spill response team and camp management will be notified immediately of any spill based on actions outlined in the Comprehensive Spill Contingency Plan. The Environmental Coordinator, Site Superintendent or designate will ensure spills are reported as required and that the relevant form is filled out as completely as possible. Sabina will externally report all spills that meet type and volume criteria to the NWT/Nunavut Spill line. Sabina will internally track all spills which take place onsite regardless of the volume spilled.

4.8 Chemicals

Chemicals stored on site will consist of drill additives, oil, grease, drill salt, and household biodegradable cleaners. Chlorine is necessary and is used to treat our drinking water system. All drill additives are stored in poly-lined seacans and the remaining salt will be tarped and stored in designated areas on the property. Drill salt is in impermeable bags and stored on pallets. Empty bags will be disposed with combustible garbage. Sabina will inspect the storage area for possible spills and contamination.

4.9 Spill Response Kits

Sabina will carry out an inventory of the spill kits located on the property. Over the winter months, all spill kits will be relocated into a secured building, except for kits designated for the remaining petroleum storage areas.

4.10 Transportation

All transport areas will be inspected for contamination. Areas will be remediated using enviromat and removal of contaminated soil should any contamination be found.

4.11 Drill Sites

The diamond drills will be dismantled into the main components as per the drilling contractor procedure and secured along with ancillary equipment and drill rods. The drills will be moved by helicopter over the tundra and left at designated storage areas on the property and will undergo a drill close-out inspection. All drill sites will be inspected for contamination. Any remaining waste will be removed and disposed of accordingly. Diamond drill site restoration will commence as soon as practical after completion of the hole. Site clean-up of litter, debris, and drill fluids will commence immediately. Drill core and core boxes will be properly secured and stored at the designated core storage area. Photographs will be taken before and after the drilling has been completed.

4.12 General Camp area

A general inspection of the camp area will be carried out. Waste items will be picked up, and areas contaminated by petroleum products unnoticed from the previous year will be reclaimed.

4.13 Final Documentation

A year-end inventory of all equipment and buildings remaining on site will be carried out prior to leaving site. Photos will be taken of the camp and drill laydown storage areas. Once the site is secured for winter, it will be documented with photos.

5.0 FINAL ABANDONMENT AND RESTORATION PLAN

5.1 Administration

5.1.1 Building Structures

All the reusable tents, frames, tarpaulins, and wooden structures will be dismantled and where possible be recycled for use at another exploration site.

Other combustible, non-recyclable building structures will be incinerated or burned onsite. Non-combustible structures or materials such as nails, screws, or metal frames will be recovered, packed, and transported off site for proper disposal.

5.1.2 Office and Household Furniture

All reusable office, household, kitchen, and recreational equipment will be packed and transported for use at other exploration camps. Some equipment, depending on what level of liability is accepted by Sabina, may be donated to local communities or schools. The equipment that is not reusable will be recycled or disposed of at an approved disposal facility, appropriate to the type of material.

5.1.3 Water Supply System

Water pumps, filtering systems, water lines, and any other equipment associated with the water supply system will be drained, disassembled, packed, and transported off site for use at other exploration camps.

Water lines that are not reusable will be disposed of at an approved facility.

5.1.4 Sewage System

The Pactos will be dismantled and relocated to another exploration camp or transported to Yellowknife for disposal. All lines from showers, washing machines, and sinks will be drained, disconnected, securely packed, and transported off site to an approved landfill site.

5.1.5 Waste Incinerator

Once the camp is entirely dismantled to the satisfaction of the supervisor in-charge, all remaining combustible waste will be burned. The incinerator will be dismantled and shipped to another exploration camp or to Yellowknife for sale or disposal in an approved facility.

5.1.6 Electrical System

All electrical wires will be removed from the buildings and any other installations at site. Extension cords

and other fittings will be transported to other exploration camps for reuse. Used electrical wires will be packed and transported to Yellowknife for recycling. Unused bulbs and fluorescent tubes will be packed and relocated to other camps.

The generator and surrounding area will be inspected for signs of spills and remaining wastes such as oil and grease. The area will be cleaned as necessary.

The generator will be drained of its fuel. Remaining waste fuel, oil, and grease will be stored in approved storage containers, labelled, and transported off site. The generator will be dismantled and transported off site to another exploration camp or to Yellowknife for sale.

5.1.7 Camp Heating Systems

Each 205-L fuel barrel attached to tents or buildings will be disconnected with the remaining fuel in the line allowed to burn out. The drums will be appropriately labelled and stored with other petroleum products. The secondary containment container will be closed, secured, and stored ready for transportation off site. The fuel burner will be dismantled and remaining fuel will be allowed to drain off into waste oil collecting system. All fuel lines will be drained, disconnected, and packed for use in other camps or transported to an approved disposal facility. The area around each installation will be inspected for contamination and reclaimed as per the Comprehensive Spill Contingency Plan. All empty propane cylinders will be transported to Yellowknife for recycling.

5.1.8 Petroleum Products and Storage Facilities

5.1.8.1 205-Litre drums

The fuel storage area will consist of segregated groups of drums with empties stored separately from the full drums. An inventory of remaining fuel will be completed and all full drums will be inspected. Transportation of Dangerous Goods (TDG) labels will be attached to the drums before transportation off site. Remaining waste fuel will be labelled with TDG labels and transported to other camps for heating purposes or transported to Yellowknife for disposal in an approved facility.

In 2006, a drum crusher was purchased and located at George camp; one is also located at Goose camp. Empty drums will be crushed and palletized for backhaul and disposal. Some drums will be retained for waste containment and subsequent backhaul.

All unused jet fuel will be relocated to other exploration camps for use in further exploration programs, or returned to Yellowknife. The areas around the drums will be inspected for contamination.

5.1.8.2 Tidy Tanks

All Tidy tanks will be disconnected from any tents or buildings. All installations will be disconnected and drained. An inventory of the remaining fuel in each tank will be recorded. The tanks will be secured and transported to other camps or to Yellowknife for sale or disposal. The area around the tanks will be

inspected for contamination.

5.1.8.3 Aboveground Storage Tanks (AST)

All installations on respective tanks will be disconnected and various hatches inspected and locked. An inventory of the remaining fuel in each tank will be recorded and all fuel tanks will be drained prior to transportation. The AST tanks will only be moved during winter months to either another camp or using winter road to a designated area on the coast and loaded onto a barge for transportation to Hay River or to Yellowknife during summer months.

5.1.8.4 Lined Fuel Farm

Once AST tanks have been removed, the lined storage areas where the tanks were located will be inspected for contamination. If contamination is evident, then procedures outlined in the Comprehensive Spill Contingency Plan will be applied to reclaim the area.

Subsequently, the high-density polyethylene (HDPE) liner will be removed, rolled, and packed for transportation off site to either another exploration camp or an approved landfill. The berms will be graded with a front loader and levelled to a natural gradient and to cover any exposed areas.

5.1.9 Household Chemicals

Household cleaners will mainly be stored in the kitchen and mine dry/change room area. Upon camp closure, any unused products will either be transported to other camps or disposed of at an appropriate facility. Half-empty containers will be taken off site to be properly disposed in an approved discharge facility. Empty containers will either be recycled or disposed of with regular garbage, if appropriate.

5.1.10 Transportation

5.1.10.1 Airstrip

A 750-metre long prepared airstrip exists at the George camp. The airstrip is located on a natural esker and no additional gravel materials were used for construction purposes. Inspection for potential top soil contamination due to refueling of aircrafts will continue until no more flights use the airstrip at the close of the program.

5.1.10.2 Helipad

Wooden deck helipads were installed southeast of the fuel farm at George camp. Inspection for potential contamination due to refueling of helicopter aircraft will continue until no more flights use the pads at the close of the program. The wood deck helipads allow for refueling to take place away from the tundra. Upon closure, the helipads will be disassembled and the clean wood will be burned.

5.2 Exploration

5.2.1 Drill Sites Management

The diamond drills will be dismantled into their main components as per the drilling contractor procedure, packaged, and secured along with its ancillary equipment and rods. The drills will be moved by helicopter over the tundra, inspected, and left at designated storage areas on the property before transporting off site.

All drill sites will be inspected for contamination. All wastes will be taken back to the camp by the drillers and disposed of as appropriate. As part of Sabina's progressive reclamation activities, diamond drill sites will be restored as soon as practical after the drill has been moved to the next site. Photos are taken prior to and after the drill work is completed and an inspection sheet is in place for the geologist to verify the site was left in good condition.

5.2.2 Drill Holes Management

5.2.2.1 Drill sump

All drill sumps (if constructed) will be recontoured and allowed to naturally revegetate. Natural sumps (if used) will simply be allowed to revegetate.

5.2.2.2 Iron Casing Management

Casing protruding above ground will be cut off to a level that will not pose a hazard and capped. The cut portion will be disposed of in an approved landfill in Yellowknife or recycled as scrap metal. Drill holes which encounter artesian water flow will be plugged with cement and capped. The collar locations of all holes will be surveyed in and will be recorded in the exploration reports.

5.2.3 Chemicals associated with Drilling Operations

5.2.3.1 Drill Additives, Cement, and Salt Management

All remaining drill additives and salt will be inventoried, packed, and transported to other projects or transported to Yellowknife or Hay River for re-sale or disposal at an appropriate facility. Empty containers and pallets will be incinerated (pallets), recycled if possible or disposed of with regular garbage.

5.2.4 Drill Core

Drill core will be properly secured and stored at a designated core storage area on the property for long-term storage. A site reference plan will be maintained to catalogue the core.

5.2.5 Excavated Trenches

Any excavated trenches will be backfilled with local material. The area will be recontoured to match the surrounding landscape, and allowed to revegetate naturally.

5.3 Environmental

5.3.1 Long-term Monitoring

Ongoing monitoring will be conducted during the summer months to ensure the area has been cleared of any hazards that may cause a significant adverse impact to the receiving environment. The monitoring will continue on a set schedule after the final abandonment until the land is relinquished and accepted by the owner. Weather collection data (Goose/George weather stations) and environmental baseline data (e.g. water sampling data) will be turned over to whoever takes over the property.

5.3.2 Documentation and Final Inspection

A detailed project site reclamation and remediation report will be created by Sabina which will specifically document and catalogue project reclamation activities. This report will be generated for distribution to specific governing agencies. This report will identify all reclamation efforts undertaken at the project site and will be supported with information pertaining to contractors used, methodology, costs, and findings. Digital photographs will be taken which will support the reclamation activities. These will be appended to the report.

5.3.3 Land Relinquishment

Once the reclamation plan is accepted and approved by Sabina, the permit holder will invite and organize a final site inspection visit with community representatives, Land Inspectors, Nunavut Water Board and the KIA. Other government organizations such as Environment Canada and Department of Fisheries and Oceans will be invited to visit the area. A written submission will be sent to the regulatory authorities asking to relinquish the land.

5.4 Abandonment & Restoration Cost Estimates

The total cost estimation for A&R plan for the Project is presented in Appendix 2. The approximate costing will be reviewed annually relative to the long-term exploration strategy for the Project and may include the following items:

- Infrastructure Demolition Cost;
- Transportation – (Labour, equipment, recycle, relocation of waste, etc.);
- Labour Cost;
    - Offsite Administrative Cost;
    - Contractor;

- Rehabilitation Cost;
    - Site Supervision – (Sabina);
    - Remedial supplies;
    - Native species supplies;
    - Contractor;
- Environmental Monitoring Cost;
    - Labour - (Sabina or Contractor);
    - Transportation – (Field sampling);
    - Analytical Cost – (External Lab);
    - Reporting – (Sabina or Contractor);
    - Consultant Costs;
- Final Documentation – (Labour Cost – Sabina or Contractor); and
- Land Relinquishment – (Travel, Reports, Site Visits, Meetings, etc.).

6.0 REVIEW OF THE ABANDONMENT AND RESTORATION PLAN

The Back River Abandonment & Restoration Plan will be reviewed on an annual basis. The next planned internal review is scheduled to take place in 2019.

APPENDIX A – MAPS, FIGURES, AND PHOTOS GEORGE CAMP AND EXPLORATION PROJECT

Figure 1. Sabina's Exploration Properties and Mineral Tenures Map, western Nunavut (as of Dec 2018).

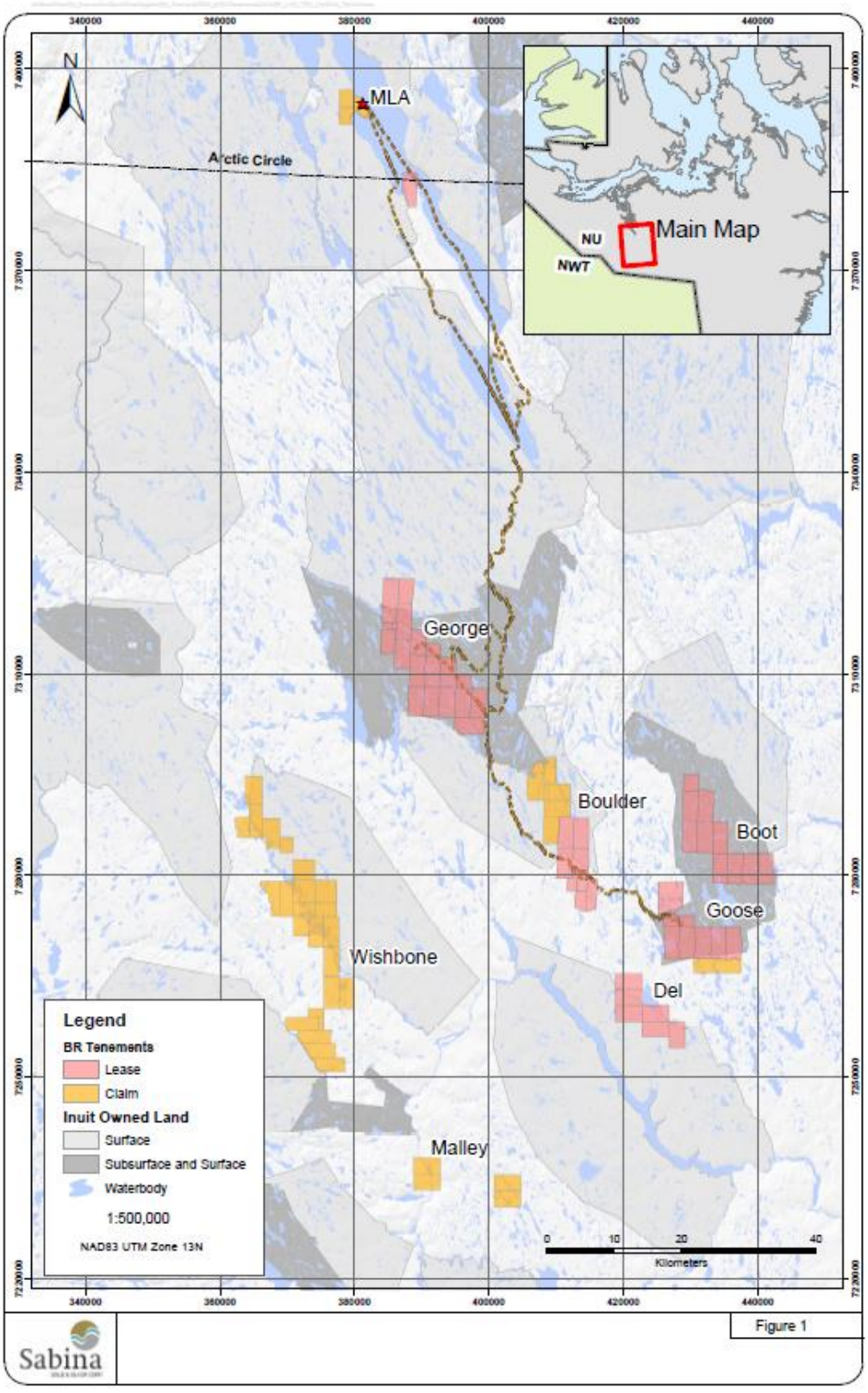


Figure 2. Aerial view of George Camp.

(Photo taken June 2016; no infrastructure changes through Dec 2018)

APPENDIX B – ABANDONMENT & RECLAMATION COST ESTIMATE

BACK RIVER RECLAMATION ESTIMATE - GEORGE December 2018

ACTIVITY/MATERIAL	UNITS	QUANTITY	UNIT COST	COST	
Exploration Activities					
DRILLHOLE RECLAMATION					
Cement (30kg)	Bags	-	$16	$0	
. Helicopter support	Hours	5	$1,762	$8,810	
Personnel - flush casing and cement	Staff Days	7	$446	$3,124	
TRENCH					
Personnel - Backfill trenches/recontour	Staff Days	-	$446	$ -	
Subtotal Exploration Activities				$11,934	**$11,934**
Building and Equipment					
EQUIPMENT					
Personnel - Disassemble and packup	Staff Days	35	$446	$15,621	
Personnel - Other (unused drilling steel/material)	Staff Days	25	$446	$11,158	
BUILDINGS					
Personnel - Disassemble Buildings & Burn Wood	Staff Days	84	$446	$37,490	
SPECIALIZED ITEMS					
Helicopter support	Hours	5	$1,762	$8,810	
Subtotal Buildings and Equipment				**$73,079**	**$73,079**
Chemicals and Contaminated Soils					
FUEL					
Disposal once off-site: diesel, Jet A/B, aviation gas	Litres	90,960	$0.43	$39,113	
WASTE OIL					
Oils/lubricants - disposal once off-site	Litres	-	$0.43	$0	
Personnel					
Helicopter support	Hours	-	$1,762	$0	
Subtotal Chemicals and Contaminated Soils				**$39,113**	**$39,113**
Mobilization and Camp Operation					
MOBILIZE HEAVY EQUIPMENT FROM SITE TO REGIONAL CENTRE					
Personnel - Cat-haul to Bathurst Inlet	Staff Days	128	$446	$57,128	
Barge	lump sum	1	$70,000	$70,000	
Helicopter support	Hours	-	$1,762	$0	
Herc Flight	Flights	1	$40,000	$40,000	
CAMP OPERATION					
Personnel - Site Support (cook, first aid, super)	Staff Days	90	$0	$0	
Camp Man-days	Staff Days	383	$485	$185,666	
Subtotal Mobilization				**$352,794**	**$352,794**
Clean up and Reclamation					
RECLAIM CAMP, ROADS & AIRSTRIP					
Personnel - Scarify and install water breaks	Staff Days	14	$446	$6,248	
Revegetation (fertilizer & peat)	Bulk	1	$12,000	$12,000	
Subtotal Reclamation				**$18,248**	**$18,248**
Post Closure Monitoring					
MONITORING DURING RECLAMATION					
Water sampling	Each	10	$500	$5,000	
Helicopter Support	Hours	3	$1,762	$5,286	
POST CLOSURE INSPECTIONS					
Annual Inspection	Each	1	$20,000	$20,000	
Subtotal Post Closure Monitoring and Maintenance				**$30,286**	**$30,286**

Subtotal Capital Costs to Close			$525,455
PROJECT MANAGEMENT (Assumes Third Party Costs)	5	% of subtotal	$26,273
CONTINGENCY	10	% of subtotal	$52,545
GRAND TOTAL - CAPITAL COSTS			**$604,273**

NOTES: 2018 Assumptions

- Assumes George is closed and reclaimed as part of progressive reclamation during exploration.
- That leaving the site will be "controlled" exit with more than one season available to complete.
- That all improvements and assets will be removed and site returned to stable conditions.
- Every effort will be taken to minimize time to complete.
- Unit cost sources are outlined in spreadsheet and where available recent and appropriate site-specific data is used.
- Mobilization off-site will be principally via Cat-Haul to Bathurst inlet and then barge.
- Demobilization of drill rigs and drill equipment/supplies/material to be completed under contractual agreement.
- Post closure monitoring and inspection will occur at end of final reclamation work, and for 1 year post closure.
- Barge costs are shared between both sites on a load portion basis (80% Goose, 20% George).
- Work is based on current inventory of diesel fuel at site; assumes that excess fuel will be disposed of off-site.

ATTACHMENT 9 - PLAIN LANGUAGE SUMMARIES

Non-technical Summary

Renewal of Type B Water Licence 2BE-GEO1520

Sabina Gold & Silver Corp. (Sabina) is a Canadian-owned exploration company that is actively operating the Back River Project (the Project) in the Kitikmeot, Nunavut Territory. The Project is located approximately 525 km northeast of Yellowknife and 400 km south of Cambridge Bay. The Project includes the Goose and George properties as well as the Marine Laydown Area at Bathurst Inlet. Sabina is the operator for the project and is responsible for maintaining all of the project permits.

As the current George property exploration water licence (2BE-GEO1520) with the Nunavut Water Board is expiring on May 29, 2020, Sabina is applying to extend the term of the licence for another 15 years to allow exploration to continue in this area.

The scope of camp activities authorized under the current licence will remain unchanged. This includes:

- Operation of existing camp at George Lake and additional temporary camps and associated water use and waste management facilities
- Exploration and geotechnical drilling
- Operation of helicopters and use of the airstrip
- Fuel storage
- Operation of a winter trails from Bathurst Inlet and between the Back River camps for re-supplying materials
- Environmental monitoring

There are no changes proposed to the licence as it currently exists.

Ayurnaittunut Naunaitkutat

Nutaannguqtiqtait taamna Type B Imarmut Laisiutaat 2BE-GEO1520

Sabina Gold taamnalu Silver Kuapuriissat (Sabina) Kanatamiutanit-nanminiriyauyuq nalvaaqhiuqtit tajja aulapkaiyut Hanningayumi Havaaghanik (Havaaghaq) talvani Qitiqmiuni, Nunavunmi Aviktuqhimayumi. Havaaghaq nayugaanga ungahiktigiyuq 525 km-nik tununngaanik kivalliqhianit Yalunamit taimaalu 400 km hivuraanit Iqaluktuuttiaq. Havaaghanut ilauyut taapkua Goose taamnalu George nanminiit taamnalu Tagiumi Iliuqaqvik Nuna Qingaungmi. Sabina-kut aulapkaiyiuyut havaaghanik munaqtiuplutiklu aulapkainiqmik tamangnik havaaghanut piinnarialiutinik.

Tajja George nanminianit nalvaaqhiuqtit imarmut laisiutaat (2BE-GEO1520) talvuuna Nunavut Imaligiyit Katimayit huuhuiqtitauniaqtuq Qiqaiyaluarvia, 29-mi, 2020-mi, Sabina-kut tughiraqtut atuffaarumaplugu laisiutait 15-nik ukiunik taimaa nalvaaqhiuqpagiamik tahamani nunami.

Havaaghaita nayugaanit angiqtauhimayut tajja laisiutaagut aallanngulaittut. Taapkuanguyut:

- Aulapkaiyut hiniktarviinik talvani George Tahianit taapkualu nayugakaffuit taapkualu ilauyut imarmik atuqtut kuvvikkuniklu iqqakuqviit
- Nalvaaqhiuqtut nunamiklu ikuutaqtut
- Aulapkaiyut halikaaptanik atuqpauhiillu milvingnik
- Uqhuqyuaq tutqumania
- Aulapkaiyut ukiuqmi ingilravingnik Qingaungmit akunnganillu Hanningayum Kuugaanit nayugaanit hunataqviini
- Avatinik munaqhiyut

Aallannguqtiqtaghaittuq tughirautainit laisiutaanut tajja ittutut.

ᓇᐃᓇᖅᓯᒪᔪᓕᒍ ᑎᑎᕆᖅᓯᒪᔪᖅ

ᓴᐋᓇᒃᑯᑦ Type B ᐃᒪᕐᒧᑦ ᓪᐃᓴᓐᓯᒧᑦ ᑐᒃᓯᕆᐅᑎᒋᑦ ᐃᓪᓕᐅᔪᑦ 2BE-GEO1520

ᓴᐋᓇᒃᑯᑦ ᔪᓗᒋᑦ ᐅᓴᕆᕆᓂᐊᖅᑐᑦ (Sabina) ᑲᓇᑕᒥᐅᓄᑦ ᓇᖏᒥᓂᕆᐅᔪᖅ ᐱᓇᓯᐊᖅᐃᒃ ᕿᑭᓂᖅᓯᒃᑐᖅ ᐅᓴᕆᕆᓂᐊᕐᑕᐅᔪᓂᒃ ᒪᓐᓇᐅᔪᖅ ᓴᓂᖏᓚᑦ ძᖏᓂ ᐅᓴᕆᕆᓂᐊᖅᐃᒪ (ᐱᓇᓯᐊᖅᐃᐅᔪᖅ) ᕿᑎᕆᒥᐅᑦ ᓄᓇᓐᓂ ᓄᓇᕐᒪ. ᑕᒪᓐᓇ ᐱᓇᓯᐊᖅᐃᐅᔪᖅ ᐅᖏᓪᓯᓂᐊ 525 ᑭᓪᒥᑕᑦ ᓴᓗᓇᐃᑦ ᐅᐊᖏᓇᓂ ᐊᒻᒪ 400 ᑭᓪᒥᑕᑦ ᐃᕆᑲᓴᑐᑎᐊᑦ ᑲᓇᖏᓂ. ᑕᒪᓐᓇ ᐱᓇᓯᐊᖅᐃᐅᔪᖅ ᐃᓪᕆᑲᑐᖅ ᔪᑦ ᐅᓴᕆᓂᐊᖅᐃᖅ ᐊᒻᒪ ᔪᐊᐹ ᐅᓴᕆᕆᓂᐊᖅᐃᖅ ᓄᓇ ᐅᓴᕆᕆᓂᐊᖅᐃᐅᔪᑦ ᐃᓪᕆᑲᕆᐅᑦ ᓯᓚᕆᓪ ᐃᓴᓐᖃᐃᖅ ᐃᑲᓂ ᕿᑭᓂᖅᓯᒃᑐᖅ. ᓴᐋᓇᒃᑯᑦ ᐅᓴᕆᕆᓂᐊᖅᑎᐅᔪᑦ ᐱᓇᓯᐊᖅᐃᐅᔪᕐᓗ ᐊᒻᒪ ᑲᒪᕐᓴᕆᑲᖅᑐᑐᓄᖅ ᐱᓇᓯᐊᕆᓂᐊᓂᔭᑦ ᐱᓴᓇᐅᐅᑕᕐᓂᖅᓯᒪᓂᖅ.

ᒪᓐᓇᐅᔪᖅ ᔪᐊᐹ ᐱᓇᓯᐊᖅᐃᐅᔪᖅ ᕿᑭᓂᖅᐃᐅᒪᑦ ᐃᒪᕐᒧᑦ ᓪᐃᓴᓐᓯᒧᑦ (2BE-GEO1520) ᐅძᓇᖅᑦ ᓄᓇᕐᒥᒥ ᐃᒪᓕᓚᓴᑲძᑦᒧᑦ ᑲᑎᒪᓴᑦ ᐃᓯᓕᓐᓂᐊᓕᕐᒪᑦ ᒪᐃ 29, 2020, ᓴᐋᓇᒃᑯᑦ ᐅᐃᔪᕆᐅᓴძᓂᐊᖅᑕᖅᑦ ᓪᐃᓴᓐᓯᒧᑦ ᐅᑭᐅᓄᑦ 15–ᓄᑦ ᕿᓂᕐᓄᓇᕿᒪᔪᓂᑎᒃ ᓄᓇᕐᔪᐊᑦ ᐊᕐᕈᑕᓂ.

ᕿᑲᓄᐃᓕᐅᕆᔨᓕᑦ ᓇᔪᖅᑕᐅᔪᒥ ᐊᔪᖅᑎᑎᑕᐅᔪᑦ ᒪᓐᓇ ᓪᐃᓴᕆᐅᔪᒥ ᐊᓯᐊᖏᓚᕆᖅᑎᑕᖅ. ᐃᓪᓕᓐᐅᑎᓯᒪᔪᑦ ᑕᐢᓯᓯᒪᖅᑐ ᐅᓂᐢᑲᑦ ᐃᓪᓕᖅᑐᑦ ᐃᓪᓕᖅᑐᑦ ᐅძᓂᐊᑦ:

- ᐊᐅᓪᓕᑎᓂᕆᔪᑦ ᓇᔪᖅᑕᐅᔪᒥ ᔪᐊᐹ ᑕᓯᐊᓂ ᐊᒻᒪ ᐃᓪᓕᖅᑲᓂᐊᑐᖅ ᓇᔪᖅᑕᐅᓪᓕᐅᕐᐱᓪᓕᓂᐊᖅᑐᓂᑲ ᐊᒻᒪ ᐃᓪᓕᖅᑲᓗᓂ ᐃᒪᖅ ᐊᑐᖅᑕᐅᓯᓂᐊ ᕿძᐃᖅᑕᐃᖅᓗᓪᓕ
- ᕿᑭᓂᖅᐃᐅᔪᖅ ᐊᒻᒪ ᐃძᑕᖅᐃᐅᔪᖅ
- ᕿძᓕᒥᔪᓕᓂᑦ ᐊᑐᖅᓪᓂᖅ ᐊᒻᒪ ᒥᑦᑕᖅᐃᒃ ᐊᑐᖅᑕᐅᓯᓂᐊ
- ᐅᖅᓯᑦ ᐃᓂᑎᓂᐊᖅᑕᖓᓕ
- ᐊᑐᖅᑕᐅᓯᓂᖏᑦ ᐅᑭᐅძᑦ ᐊᕿძᑕᐅᓯᒃᑐᑦ ᕿᑭᓐᓄᐅᔪᑦ ᐊᒻᒪ ᓴᓂᖏᓚᕆᑦ ᐊᑕᐅᓂᖅᑐᑦ ᐱᕕᓂᓂᒃ ᐅᓯᖏᑎᐃᐃᐅᓯᒃᑐᑦ
- ᐊᓯᑎᓪᓕᓂᕆᔪᑦ ᖃᐅᔨᑎᑦᓯᓂᖅ

ᑕᒪᓐᓇ ᓪᐃᓴᖃᑕᐅᔪᖅ ᒪᓐᓇᐅᔪᖅ ᐊᑐᖅᑕᐅᓂᖏᓐᓄ ᐊᓯᐊᖏᓚᕆᐅᔪᖏᓐᓄᑦ ᐱᓇᓯᐊᖅᑕᐅᔪᓂᒃ.

ATTACHMENT 10 – TABLE OF LEASES AND AUTHORIZATIONS

Table 1. Claims and Leases Related to Water Licence 2BE-GEO1520

Property	Type	Orig. Claim #	Orig. Claim Name	Lease #	Status	Lease Rent Date	Lease Expiry Date OR Claim Lapse Date
George	Mineral Lease	F15619	BRAU 39	3677	Current	2019-10-16	2039-10-16
George	Mineral Lease	F15617	BRAU 40	3729	Current	2019-10-16	2039-10-16
George	Mineral Lease	F15618	BRAU 70	3730	Current	2019-10-16	2039-10-16
George	Mineral Lease	F10407	LAB	3562	Current	2019-11-09	2036-11-09
George	Mineral Lease	F98491, F98492	GS 1, GS 2	5707	Current	2019-11-25	2036-11-25
George	Mineral Lease	F10412	BRAU 12	3605	Current	2019-12-19	2039-12-19
George	Mineral Lease	F10413	BRAU 13	3606	Current	2019-12-19	2039-12-19
George	Mineral Lease	F10443	BRAU 14	3607	Current	2019-12-19	2039-12-19
George	Mineral Lease	F10444	BRAU 15	3608	Current	2019-12-19	2039-12-19
George	Mineral Lease	F10410	BRAU 10	3649	Current	2019-12-19	2039-12-19
George	Mineral Lease	F10411	BRAU 11	3653	Current	2019-12-19	2038-12-19
George	Mineral Lease	F02772	BRAU 4	3598	Current	2019-12-28	2037-12-28
George	Mineral Lease	F02771	BRAU 3	3599	Current	2019-12-28	2037-12-28
George	Mineral Lease	F02773	BRAU 5	3600	Current	2019-12-28	2037-12-28
George	Mineral Lease	F02774	BRAU 6	3601	Current	2019-12-28	2037-12-28
George	Mineral Lease	F02775	BRAU 7	3602	Current	2019-12-28	2037-12-28
George	Mineral Lease	F02776	BRAU 8	3603	Current	2019-12-28	2037-12-28
George	Mineral Lease	F02777	BRAU 9	3604	Current	2019-12-28	2037-12-28
George	Mineral Lease	F02769	BRAU 1	3650	Current	2019-12-28	2037-12-28
George	Mineral Lease	F02770	BRAU 2	3651	Current	2019-12-28	2037-12-28
Bath	Mineral Lease	F64622	BATH 1	5152	Current	2019-03-10	2029-03-10
Bath	Claim	F94555	SABINA 3	n/a	Current	n/a	2024-09-25
Bath	Claim	F94554	SABINA 2	n/a	Current	n/a	2024-09-25

Table 2. Authorizations Related to Water Licence 2BE-GEO1520

Authorization No.	Expiry (year-mo-day)	Agency	Description
PC No. 007	N/A	NIRB	Back River Project NIRB Project Certificate
2AM-BRP1831	31/12/2031	NWB	Back River Type A Water License
N/A	2038-06-31	KIA	Inuit Impact and Benefit Agreement
KTCL-18D002	20/04/2038	KIA	Commercial Lease - MLA
KTCL-18D003	20/04/2038	KIA	Commercial Lease - Winter Road
KTAEL-18C001	20/04/2023	KIA	Advanced Exploration Lease - George
LUL-XX	5 years from Effective Date	KIA	Land Use Licence as per KIA Framework Agreement
KTL312C004	12/12/2018	KIA	Wishbone-Malley Exploration Activities
N2018F0021	29/10/2023	CIRNAC	CAT Train Beechy Lake Area
N2017F0016	20/07/2022	CIRNAC	CAT Train connecting Bathurst Inlet - Back River Project
N2012C0003	06/02/2019	CIRNAC	Wishbone-Malley Exploration Activities
N2016C0011	26/10/2021	CIRNAC	Back River Exploration Activities
N2018F0017	11/10/2023	CIRNAC	Winter Ice Road Back River Project
Lease No. 76J/12-7-2	14/08/2048	CIRNAC	Marine environment land lease - adjacent to MLA
2BE-GEO1520	29/05/2020	NWB	George Water Licence (Type B)
2BE-MLL1722	29/06/2022	NWB	Wishbone-Malley Water Licence (Type B)
18-HCAA-00971	N/A	DFO	Letter of Authorization - MLA
18-HCAA-01626	N/A	DFO	Letter of Authorization - Winter Ice Road
04 009 19R-M	31/12/2019	NRI	Back River Project Scientific Research License
2012-600767-002	N/A	TC	Navigation Protection Act - MLA Discharge Pipeline Permission Notice
2012-600767-003	N/A	TC	Navigation Protection Act - MLA Intake Pipeline Permission Notice
2012-600767-006	N/A	TC	Navigation Protection Act - MLA Lightering Barge

ATTACHMENT 11 – CERTIFICATE OF AMENDMENT OF REGISTRATION

No.: **ET8219**

ᓄᓇᕗᑦ

Nunavut

Canada

BUSINESS CORPORATIONS ACT

CERTIFICATE OF AMENDMENT OF REGISTRATION OF AN EXTRA-TERRITORIAL CORPORATION

LOI SUR LES SOCIÉTÉS ACTIONS

CERTIFICAT DE MODIFICATION DE L'ENREGISTREMENT D'UNE SOCIÉTÉ PAR ACTIONS EXTRATERRITORIALE

I HEREBY CERTIFY THAT
the name of

JE CERTIFIE PAR LA PRÉSENTE QUE
La dénomination sociale de

SABINA SILVER CORPORATION

Registered under Part XXI of the
Business Corporations Act of Nunavut,
has been changed to

Enregistrée en vertu de la Partie XXI de la
Loi sur les sociétés par actions au Nunavut,
a été changée pour

SABINA GOLD & SILVER CORP.

Effective as of

à compter du

10/27/2009

Dated
Fait le

04-Nov-2009

DEPUTY / REGISTRAR OF CORPORATIONS
REGISTRAIRE OU REGISTRAIRE ADJOINT DES SOCIÉTÉS PAR ACTIONS

ATTACHMENT 12 – ENGAGEMENT RECORD

Record of Meetings and Major Correspondence with Community and Stakeholder Groups

Date	Individual(s) / Organization	Type of Activity
Cambridge Bay		
February 14, 2012	Brenda Sitatak HTO Manager	Introductions and information sharing.
February 14, 2012	Renee Krucas Executive Director, Kitikmeot Heritage Society	Introductions and information sharing.
February 14, 2012	Connie Kapolak High School Principal	Introductions and information sharing.
March 27, 2012	Brenda Sitatak HTO Manager	Introductions and update.
March 27, 2012	Stephen King, Senior Administrative Officer Jim McEchrean, Economic Development Officer Hamlet of Cambridge Bay	Project introduction.
April 5, 2012	Renee Krucas Executive Director, Kitikmeot Heritage Society	Letter / invitation to nominate representatives to the Cambridge Bay Community Advisory Group.
April 5, 2012	Stephen King, Senior Administrative Officer Hamlet of Cambridge Bay	Letter / invitation to nominate representative to the Cambridge Bay Community Advisory Group.
April 5, 2012	Brenda Sitatak HTO Manager	Letter / invitation to nominate representative to the Cambridge Bay Community Advisory Group.
June 14, 2012	General public	Call-in radio show.
June 14, 2012	Jessie Lyall, HTO Board Member Brenda Sitatak, HTO Manager	Project introduction.
June 14, 2012	General public	Public meeting - Project overview.
June 14, 2012	Hamlet Council and administration	Project introduction.
June 15, 2012	Cambridge Bay Community Advisory Group	Project introduction.
September 11-12, 2012	Cambridge Bay Community Advisory Group	Sabina hosted a dinner and meeting for the Cambridge Bay and Kugluktuk Community Advisory Groups (CAGs) in Cambridge Bay on September 11, 2012. The CAGs also visited the Back River Project site on September 12, 2012.
September 27-29, 2012	Interviews conducted with a number of individuals representing a variety of interests in the community including: government administration; health, wellness and social services; safety and protection services; business and economic development; and education and training	Socio-economic baseline data collection; documentation of expected Project benefits, Project concerns, and suggested mitigation measures.
November 19, 2012	General public	Call-in radio show.

November 19, 2012	High school students and staff	Mining and geology presentation.
November 19, 2012	General public	Public open house.
November 19, 2012	Cambridge Bay Community Advisory Group	Project update.
November 30 - December 1, 2012	Local hunters from Cambridge Bay	Land use focus group.
February 5-6, 2013	General public	Sabina representatives participated in NIRB's scoping meetings for the Project and were available to the public for questions and information sharing.
February 5, 2013	Cambridge Bay Community Advisory Group	Project update.
April 23, 2013	General public	Public meeting - Project overview/update.
April 23, 2013	Cambridge Bay HTO	Project overview/update.
August 20, 2013	General public	Sabina provided an overview of the Back River Project and its traditional knowledge study.
August 20, 2013	General public	The Kitikmeot Inuit Association provided an overview of the Naonaiyaotit Traditional Knowledge Project (NTKP) report completed for the Back River Project and additional traditional knowledge workshops being conducted.
August 21, 2013	Cambridge Bay Community Advisory Group	Project update and review of Inuinnaqtun terminology for traditional seasons.
August 21-23, 2013	Selected elders and knowledge holders	A series of traditional knowledge workshops were held with selected elders and local knowledge holders for Sabina's traditional knowledge study. These workshops focused on the topics of 'heritage and land use', 'terrestrial environment' and 'marine environment'.
November 19, 2013	General public	Public meeting - Project overview/update & DEIS submission overview.
November 19, 2013	Cambridge Bay Community Advisory Group	Project update.
November 19, 2013	Cambridge Bay high school students	Project overview and discussion of future employment opportunities.
November 19, 2013	General public	Radio update.
January 23, 2014	General public	Career fair participation.
February 2014	Kitikmeot Heritage Society	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
February 2014	Cambridge Bay Community Advisory Group	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
February 2014	Hamlet of Cambridge Bay	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.

February 2014	Cambridge Bay HTO	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
March 25, 2014	General public	NIRB held community information sessions for the Project's DEIS and were available to the public for questions and information sharing. Note – Sabina representatives were unable to attend due to flight cancellations.
March 28, 2014	Cambridge Bay Community Advisory Group	Project update.
April 27, 2014	General public	Radio update / call-in radio show.
April 28, 2014	Jim McEchrean, Economic Development Officer, Hamlet of Cambridge Bay	Project update.
April 28, 2014	Brendan Griebel, Executive Director, Kitikmeot Heritage Society	Introductions and Project update/overview.
April 28, 2014	General public	Radio update / call-in radio show.
June 7-10, 2014	Selected elders and knowledge holders	A series of traditional knowledge interviews were held with selected elders and local knowledge holders as a component of proposed fish offsetting activities in the Bernard Harbour, Nunavut area.
July 14-15, 2014	Cambridge Bay Community Advisory Group	Sabina hosted the Cambridge Bay and Kugluktuk Community Advisory Groups at the Back River Project site on July 14-15. Site tours were provided and Project information was shared.
October 28,2014	Hamlet of Cambridge Bay	Project update.
November 20, 2014	Cambridge Bay Community Readiness Initiative Committee	Sabina met with Cambridge Bay's Community Readiness Initiative Committee.
December 18, 2014	Cambridge Bay Community Readiness Initiative Committee	Sabina met with Cambridge Bay's Community Readiness Initiative Committee.
February 5, 2015	Cambridge Bay high school students	Project overview and discussion of future employment opportunities.
February 9, 2015	Kitikmeot Heritage Society representatives	Project update and discussion of potential future donations.
February 9, 2015	Gordon Bligh, Arctic College	Project update and discussion of mine-related training/education.
March 10, 2015	Cambridge Bay Community Readiness Initiative Committee	Sabina met with Cambridge Bay's Community Readiness Initiative Committee.
April 7, 2015	Cambridge Bay Community Readiness Initiative Committee	Sabina met with Cambridge Bay's Community Readiness Initiative Committee.
May 10, 2015	Cambridge Bay Community Readiness Initiative Committee	Sabina met with Cambridge Bay's Community Readiness Initiative Committee.

June 15, 2015	Cambridge Bay Community Advisory Group	Project update and FEIS submission overview.
June 16, 2015	Hamlet of Cambridge Bay Representatives	Project update and FEIS submission overview.
June 16, 2015	General public	Public meeting – Project update and FEIS submission overview.
October 7, 2015	Cambridge Bay HTO	Project update and FEIS submission overview.
February 10, 2016	Cambridge Bay Community Advisory Group	Project update and FEIS submission/NIRB final hearings overview.
March 5, 2016	Hamlet of Cambridge Bay Cambridge Bay HTO	Emailed letter re: Sabina's FEIS submission.
April 11-12, 2016	Cambridge Bay HTO Representative Cambridge Bay Community Wellness Centre Representative	Representatives from the Cambridge Bay HTO and Community Wellness Centre participated in meetings and a Back River Project site visit hosted by Sabina.
July 6, 2016	Cambridge Bay Community Advisory Group	Project update re: NIRB final hearing report.
July 6, 2016	General Public	Public Meeting – Project update re: NIRB final hearing report.
July 7, 2016	Cambridge Bay HTO	Project update re: NIRB final hearing report.
September 15, 2016	General Public	Sabina participated in the Cambridge Bay portion of the 2016 Kitikmeot Career Fair.
September 19, 2016	Hamlet of Cambridge Bay	Project update re: NIRB final hearing report (Sabina representatives participated in-person and via teleconference).
November 30, 2016	General Public	Project update and update on revised Wildlife Mitigation and Monitoring Program.
December 1, 2016	Cambridge Bay HTO	Project update and update on revised Wildlife Mitigation and Monitoring Program.
December 1, 2016	General Public	Sabina representatives set up an informational table at the Co-op regarding the revised Wildlife Mitigation and Monitoring Program.
December 1, 2016	Cambridge Bay Community Advisory Group	Project update and update on revised Wildlife Mitigation and Monitoring Program.
January 23, 2017	Cambridge Bay Community Advisory Group members (various) Past Project employee	Letter – Update on January 12, 2017 INAC Minister's decision and thank you for providing letter of support.
April 21, 2017	Cambridge Bay HTO	Project update and FEIS Addendum overview.
April 21, 2017	Hamlet of Cambridge Bay Representatives	Project update and FEIS Addendum overview.
April 21, 2017	General Public	Public meeting - Project update and FEIS Addendum overview.

September 2017	Various Parties (e.g. Hamlet of Cambridge Bay, selected Cambridge Bay Community Advisory Group members, individual)	Letter – Project update and thank you for providing letter of support.
October 2, 2017	General public	Career fair participation.
Kugluktuk		
April 11, 2012	Barbara Adjun HTO Manager	Letter / invitation to nominate representative to the Kugluktuk Community Advisory Group.
April 26, 2013	Donald LeBlanc, Senior Administrative Officer Hamlet of Kugluktuk	Letter / invitation to nominate representative to the Kugluktuk Community Advisory Group.
June 12, 2012	Kugluktuk HTO	Project introduction.
June 12, 2012	General public	Public meeting - Project overview.
June 13, 2012	Donald LeBlanc, Senior Administrative Officer Hamlet of Kugluktuk	Project introduction.
June 13, 2012	Kugluktuk Community Advisory Group	Project introduction.
September 11-12, 2012	Kugluktuk Community Advisory Group	Sabina hosted a dinner and meeting for the Kugluktuk and Cambridge Bay Community Advisory Groups (CAGs) in Cambridge Bay on September 11, 2012. The CAGs also visited the Back River Project site on September 12, 2012.
October 1-3, 2012	Interviews conducted with a number of individuals representing a variety of interests in the community including: government administration; health, wellness and social services; safety and protection services; business and economic development; and education and training	Socio-economic baseline data collection; documentation of expected Project benefits, Project concerns, and suggested mitigation measures.
November 21, 2012	High school students and staff	Mining and geology presentation.
November 21, 2012	General public	Public meeting - Project overview/update.
November 21, 2012	Kugluktuk Community Advisory Group	Project update.
November 27, 2012	Local hunters from Kugluktuk	Land use focus group.
February 7-8, 2013	General public	Sabina representatives participated in NIRB's scoping meetings for the Project and were available to the public for questions and information sharing.
February 8, 2013	Kugluktuk Community Advisory Group	Project update.
April 22, 2013	General public	Public meeting - Project overview/update.
April 22, 2013	Kugluktuk Community Advisory Group	Project update.
August 12, 2013	General public	Sabina provided an overview of the Back River Project and its traditional knowledge study.

August 13, 2013	General public	The Kitikmeot Inuit Association provided an overview of the Naonaiyaotit Traditional Knowledge Project (NTKP) report completed for the Back River Project and additional traditional knowledge workshops being conducted.
August 14-16, 2013	Selected elders and knowledge holders	A series of traditional knowledge workshops were held with selected elders and local knowledge holders for Sabina's traditional knowledge study. These workshops focused on the topics of 'heritage and land use', 'terrestrial environment' and 'marine environment'.
November 18, 2013	General public	Public meeting - Project overview/update & DEIS submission overview.
November 18, 2013	Kugluktuk Hamlet Council	Project update.
November 18, 2013	Kugluktuk Community Advisory Group	Project update.
November 18, 2013	Kugluktuk high school students	Project overview and discussion of future employment opportunities.
January 24, 2014	General public	Career fair participation.
February 12, 2014	Donald LeBlanc, Senior Administrative Officer Hamlet of Kugluktuk	Letter / invitation to nominate representative to the Kugluktuk Community Advisory Group.
February 2014	Kugluktuk Community Advisory Group	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
February 2014	Hamlet of Kugluktuk	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
February 2014	Kugluktuk HTO	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
March 19, 2014	David Nivingalok (Chairperson) and Kevin Klengenberg (Secretary-Treasurer), Kugluktuk HTO	Teleconference to discuss proposed fish offsetting work to be conducted at Bernard Harbour.
March 24, 2014	General public	Sabina representatives participated in NIRB's community information sessions for the Project's DEIS and were available to the public for questions and information sharing.
March 24, 2014	Kugluktuk Community Advisory Group	Project update.
March 25, 2014	Kugluktuk HTO	Meeting to discuss proposed fish offsetting work to be conducted at Bernard Harbour and the associated TK study.
April 29, 2014	Kugluktuk HTO	Meeting to discuss Kugluktuk HTO-Sabina Bernard Harbour Restoration Project Agreement.
April 30, 2014	Kugluktuk Community Readiness Initiative Committee	Sabina met with Kugluktuk's Community Readiness Initiative Committee in Kugluktuk to discuss the plans and goals of the committee and how Sabina might contribute.

April 30, 2014	Donald LeBlanc, SAO, Hamlet of Kugluktuk	Project update.
May 2, 2014	Kugluktuk Community Readiness Initiative Committee	Sabina met with Kugluktuk's Community Readiness Initiative Committee in Yellowknife to discuss the plans and goals of the committee and how Sabina might contribute.
June 1-6, 2014	Selected elders and knowledge holders	A series of traditional knowledge interviews were held with selected elders and local knowledge holders as a component of proposed fish offsetting activities in the Bernard Harbour, Nunavut area. A project overview meeting/presentation was also held with local study participants prior to the interviews commencing.
July 13, 2014	Bernard Harbour TK study participants, HTO chairperson, and acting HTO manager	A TK study results verification meeting was held with participants in the Bernard Harbour TK study and with the Kugluktuk HTO chairperson and acting manager. Various clarifications were made by the participants, which were later incorporated into the final TK study report.
July 14-15, 2014	Kugluktuk Community Advisory Group	Sabina hosted the Cambridge Bay and Kugluktuk Community Advisory Groups at the Back River Project site on July 14-15. Site tours were provided and Project information was shared.
July 17, 2014	Kugluktuk HTO chairperson	The chairperson of the Kugluktuk HTO accompanied Sabina representatives and various other attendees during a day-long site visit to the Bernard Harbour stream restoration project.
February 12, 2015	Kugluktuk Community Advisory Group	Sabina provided a Project update and administered a country food consumption questionnaire.
February 12, 2015	Kugluktuk HTO representatives	Sabina met with the Kugluktuk HTO chairperson, treasurer, and manager to provide an update on the Bernard Harbour restoration project and Bernard Harbour TK study.
February 17, 2015	Kugluktuk HTO	Letter and copy of the draft 'Traditional Knowledge Study Report on the Arctic Char Fishery in the Nulahugyuk Creek – Hingittok Lake Area (Bernard Harbour), Nunavut' provided to the HTO.
April 21, 2015	Kugluktuk HTO	Final copy of the 'Traditional Knowledge Study Report on the Arctic Char Fishery in the Nulahugyuk Creek – Hingittok Lake Area (Bernard Harbour), Nunavut' provided to the HTO.
May 8, 2015	Barbara Adjun, Kugluktuk HTO Manager	Phone update on the Bernard Harbour restoration project.
May 21, 2015	David Nivingalok, Kugluktuk HTO Chairperson	Phone update on the Bernard Harbour restoration project.
May 27, 2015	Hamlet of Kugluktuk	Sabina participated (via teleconference) in a multi-stakeholder information session hosted on Kugluktuk's

		Community Readiness Initiative where feedback was sought on the draft Kugluktuk Community Readiness Report.
June 17, 2015	General public	Public meeting – Project update and FEIS submission overview. The results of the Bernard Harbour TK study and plans for the Bernard Harbour restoration project were also reviewed.
June 18, 2015	Kugluktuk Community Advisory Group	Project update and FEIS submission overview.
June 18, 2015	Kugluktuk HTO	Project update and FEIS submission overview. The results of the Bernard Harbour TK study and plans for the Bernard Harbour restoration project were also reviewed.
June 19, 2015	Hamlet of Kugluktuk	Project update and FEIS submission overview.
July 8, 2015	David Nivingalok, Kugluktuk HTO Chairperson	Letter providing information on the 2015 Bernard Harbour work proposal.
February 11, 2016	Kugluktuk HTO	Project update and FEIS submission/NIRB final hearings overview. Bernard Harbour project update.
February 12, 2016	Kugluktuk Community Advisory Group	Project update and FEIS submission/NIRB final hearings overview.
March 5, 2016	Hamlet of Kugluktuk Kugluktuk HTO	Emailed letter re: Sabina's FEIS submission.
March 16-17, 2016	Kugluktuk Job Fair and Graduation Ceremony	Sabina participated in a job fair and graduation ceremonies in Kugluktuk.
April 11-12, 2016	Kugluktuk HTO Representatives	Representatives from the Kugluktuk HTO participated in meetings and a Back River Project site visit hosted by Sabina.
June 7, 2016	General Public	Public Meeting on the Bernard Harbour Restoration Project
June 8-9, 2016	Kugluktuk HTO and Invited Participants	Bernard Harbour Restoration Project Workshop
June 17, 2016	Kugluktuk HTO	Teleconference Project update re: NIRB final hearing report.
July 5, 2016	Hamlet of Kugluktuk	Project update re: NIRB final hearing report.
July 5, 2016	General Public	Public meeting – Project update re: NIRB final hearing report.
July 6, 2016	Kugluktuk Community Advisory Group	Project update re: NIRB final hearing report.
September 16, 2016	General Public	Sabina participated in the Kugluktuk portion of the 2016 Kitikmeot Career Fair.
November 9, 2016	Kugluktuk HTO	Sabina provided a Bernard Harbour Restoration Project update by teleconference.

December 2, 2016	Kugluktuk HTO	Project update, Bernard Harbour project update, and update on revised Wildlife Mitigation and Monitoring Program
December 3, 2016	General Public	Call-in radio show - Project update and update on revised Wildlife Mitigation and Monitoring Program
December 3, 2016	General Public	Project update and update on revised Wildlife Mitigation and Monitoring Program
December 4, 2016	Kugluktuk Community Advisory Group	Project update and update on revised Wildlife Mitigation and Monitoring Program
January 23, 2017	Hamlet of Kugluktuk Kugluktuk HTO Three elders Community member	Letter – Update on January 12, 2017 INAC Minister's decision and thank you for providing letter of support.
April 24, 2017	Hamlet of Kugluktuk	Project update and FEIS Addendum overview.
April 24, 2017	Kugluktuk HTO	Project update and FEIS Addendum overview.
April 24, 2017	General Public	Public meeting - Project update and FEIS Addendum overview.
September 2017	Various Parties (e.g. Hamlet of Kugluktuk, Kugluktuk HTO, selected Elders, individual)	Letter – Project update and thank you for providing letter of support.
October 5, 2017	General public	Career fair participation.
Kingaok and Omingmaktok		
April 5, 2012	Sam Kapolak, Chairperson Bathurst Inlet HTO	Letter / invitation to nominate representative to the Cambridge Bay Community Advisory Group.
April 5, 2012	Peter Kapolak, Chairperson Omingmaktok HTO	Letter / invitation to nominate representative to the Cambridge Bay Community Advisory Group.
November 18, 2012	Various residents of Kingaok and Omingmaktok	Sabina hosted a Project information meeting in Cambridge Bay specifically for residents of Kingaok and Omingmaktok.
November 30 - December 1, 2012	Local hunters from the Bathurst Inlet area	Land use focus group.
Fall 2012	Interviews conducted with selected individuals from the Bathurst Inlet area for Sabina's socio-economic study	Socio-economic baseline data collection; documentation of expected Project benefits, Project concerns, and suggested mitigation measures.
January 1, 2013	Boyd Warner President, Bathurst Inlet Lodge	Project discussion (via phone).
August 14-16, 2013 (in Kugluktuk) August 21-23 (in Cambridge Bay)	Selected elders and knowledge holders from or familiar with the Bathurst Inlet area	A series of traditional knowledge workshops were held with selected elders and local knowledge holders for Sabina's traditional knowledge study. These workshops focused on the topics of 'heritage and land use', 'terrestrial environment' and 'marine environment'.

November 19, 2013	Various residents of Kingaok and Omingmaktok	Project update in Cambridge Bay specifically for residents of Kingaok and Omingmaktok and the Cambridge Bay community advisory group.
February 2014	Omingmaktok HTO	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
September 24, 2014	Residents of Kingaok and Omingmaktok	Letter / invitation to attend October 28, 2014 dinner and meeting on the Back River Project in Cambridge Bay, specifically for residents of Kingaok and Omingmaktok.
October 28, 2014	Residents of Kingaok and Omingmaktok	Dinner and meeting on the Back River Project in Cambridge Bay, specifically for residents of Kingaok and Omingmaktok.
January 21, 2015	Residents of Kingaok and Omingmaktok	Letter / invitation to attend February 8, 2015 dinner and meeting on the Back River Project in Cambridge Bay, specifically for residents of Kingaok and Omingmaktok.
May 21, 2015	Residents of Kingaok and Omingmaktok	Letter / invitation to attend June 15, 2015 dinner and meeting on the Back River Project in Cambridge Bay, specifically for residents of Kingaok and Omingmaktok.
June 15, 2015	Residents of Kingaok and Omingmaktok	Dinner and meeting on the Back River Project (re: Project update and FEIS submission overview) in Cambridge Bay, specifically for residents of Kingaok and Omingmaktok.
February 9, 2016	Residents of Kingaok and Omingmaktok	Dinner and meeting on the Back River Project (re: Project update, FEIS submission, and NIRB final hearings overview) in Cambridge Bay, specifically for residents of Kingaok and Omingmaktok.
March 5, 2016	Bathurst Inlet HTO Bay Chimo HTO	Emailed letter re: Sabina's FEIS submission.
April 11-12, 2016	Bathurst Inlet HTO Representative Bay Chimo HTO Representative	Representatives from the Bathurst Inlet HTO and Bay Chimo HTO participated in meetings and a Back River Project site visit hosted by Sabina.
December 1, 2016	Residents of Kingaok and Omingmaktok	Project update and update on revised Wildlife Mitigation and Monitoring Program
April 23, 2017	Kingaok and Omingmaktok Representatives	Project update and FEIS Addendum overview.
Gjoa Haven		
June 20, 2012	Hamlet Council members and staff	Project introduction.
June 20, 2012	General public	Public meeting - Project overview.
September 17-19, 2012	Interviews conducted with a number of individuals representing a variety of interests in the community including: government administration; health, wellness and social services; business and economic development; and education and training	Socio-economic baseline data collection; documentation of expected Project benefits, Project concerns, and suggested mitigation measures.

February 12, 2013	General public	Sabina representatives participated in NIRB's scoping meeting for the Project and were available to the public for questions and information sharing.
February 13, 2013	General public	Radio Show - Project update and notice of upcoming Actua educational program for Kitikmeot youth.
April 24, 2013	General public	Public meeting - Project overview/update.
April 24, 2013	Gjoa Haven HTO	Project overview/update.
April 24, 2013	General public	Radio Show - Project update.
November 20, 2013	General public	Public meeting - Project overview/update & DEIS submission overview.
November 20, 2013	Gjoa Haven HTO	Project update.
November 20, 2013	Hamlet of Gjoa Haven representatives	Project update.
November 20, 2013	Gjoa Haven high school students	Project overview and discussion of future employment opportunities.
November 20, 2013	General public	Radio update.
January 21, 2014	General public	Career fair participation.
February 2014	Hamlet of Gjoa Haven	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
February 2014	Gjoa Haven HTO	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
March 26, 2014	General public	NIRB held community information sessions for the Project's DEIS and were available to the public for questions and information sharing. Note – Sabina representatives were unable to attend due to flight cancellations.
March 5, 2016	Hamlet of Gjoa Haven Gjoa Haven HTO	Emailed letter re: Sabina's FEIS submission.
March 7, 2016	Hamlet of Gjoa Haven Gjoa Haven HTO Residents of Gjoa Haven	Emailed letter re: recent attempts by Sabina to host a public meeting in Gjoa Haven.
April 11-12, 2016	Hamlet of Gjoa Haven Representative Kitikmeot Inuit Association (Gjoa Haven) Representative	Representatives from the Hamlet of Gjoa Haven and Kitikmeot Inuit Association (Gjoa Haven) participated in meetings and a Back River Project site visit hosted by Sabina.
July 8, 2016	Hamlet of Gjoa Haven representatives	Project update re: NIRB final hearing report.
July 8, 2016	General Public	Public meeting - Project update re: NIRB final hearing report.
January 23, 2017	Hamlet of Gjoa Haven Past Project employees (various)	Letter – Update on January 12, 2017 INAC Minister's decision and thank you for providing letter of support.

April 18, 2017	Hamlet of Gjoa Haven	Project update and FEIS Addendum overview.
April 18, 2017	General Public	Public meeting - Project update and FEIS Addendum overview.
September 2017	Various Parties (e.g. Hamlet of Gjoa Haven, individuals)	Letter – Project update and thank you for providing letter of support.
Taloyoak		
June 19, 2012	General public	Public meeting - Project overview.
June 19, 2012	Taloyoak HTO	Project overview.
June 19, 2012	Tommy Aiyout, Mayor of Taloyoak David Irqquit, Assistant SAO Hamlet of Taloyoak	Project overview.
September 25-26, 2012	Interviews conducted with a number of individuals representing a variety of interests in the community including: government administration; health, wellness and social services; safety and protection services; business and economic development; and education and training	Socio-economic baseline data collection; documentation of expected Project benefits, Project concerns, and suggested mitigation measures.
February 13, 2013	General public	Sabina representatives participated in NIRB's scoping meeting for the Project and were available to the public for questions and information sharing.
February 14, 2013	General public	Radio Show - Project update and notice of upcoming Actua educational program for Kitikmeot youth.
April 25, 2013	General public	Public meeting - Project overview/update.
April 25, 2013	General public	Radio Show - Project update.
November 21, 2013	General public	Public meeting - Project overview/update & DEIS submission overview.
November 21, 2013	Taloyoak HTO	Project update.
November 21, 2013	Taloyoak Hamlet Council	Project update.
November 21, 2013	Taloyoak high school students	Project overview and discussion of future employment opportunities.
November 21, 2013	General public	Radio update.
January 20, 2014	General public	Career fair participation.
February 2014	Hamlet of Taloyoak	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
February 2014	Taloyoak HTO	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
March 28, 2014	General public	NIRB held community information sessions for the Project's DEIS and were available to the public for

		questions and information sharing. Note – Sabina representatives were unable to attend due to flight cancellations.
June 17, 2015	General public	Public meeting – Project update and FEIS submission overview.
June 17, 2015	Hamlet of Taloyoak	Project update and FEIS submission overview.
March 5, 2016	Hamlet of Taloyoak Taloyoak HTO	Emailed letter re: Sabina's FEIS submission.
April 11-12, 2016	Hamlet of Taloyoak Representative Taloyoak HTO Representative	Representatives from the Hamlet of Taloyoak and Taloyoak HTO participated in meetings and a Back River Project site visit hosted by Sabina.
July 7, 2016	Taloyoak HTO	Project update re: NIRB final hearing report.
July 7, 2016	Hamlet of Taloyoak representatives	Project update re: NIRB final hearing report.
July 7, 2016	General Public	Public meeting - Project update re: NIRB final hearing report.
January 23, 2017	Hamlet of Taloyoak	Letter – Update on January 12, 2017 INAC Minister's decision and thank you for providing letter of support.
April 20, 2017	Taloyoak HTO	Project update and FEIS Addendum overview.
April 20, 2017	Hamlet of Taloyoak Representatives	Project update and FEIS Addendum overview.
April 20, 2017	General Public	Public meeting - Project update and FEIS Addendum overview.
September 2017	Hamlet of Taloyoak	Letter – Project update and thank you for providing letter of support.
October 3, 2017	General public	Career fair participation.
Kugaaruk		
June 18, 2012	General public	Public meeting - Project overview.
September 20-21, 2012	Interviews conducted with a number of individuals representing a variety of interests in the community including: government administration; health, wellness and social services; safety and protection services; business and economic development; and education and training	Socio-economic baseline data collection; documentation of expected Project benefits, Project concerns, and suggested mitigation measures.
February 11, 2013	General public	Sabina representatives participated in NIRB's scoping meeting for the Project and were available to the public for questions and information sharing.
February 11, 2013	General public	Radio Show - Project update and notice of upcoming Actua educational program for Kitikmeot youth.
April 26, 2013	General public	Public meeting - Project overview/update.
April 26, 2013	General public	Radio Show - Project update.

April 26, 2013	Kugaaruk Hamlet Council	Project overview/update.
November 22, 2013	General public	Public meeting - Project overview/update & DEIS submission overview.
November 22, 2013	Kugaaruk Hamlet Council	Project update.
November 22, 2013	Kugaaruk high school students	Project overview and discussion of future employment opportunities.
November 22, 2013	General public	Radio update.
January 22, 2014	General public	Career fair participation.
February 2014	Hamlet of Kugaaruk	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
February 2014	Kugaaruk HTO	Letter – Update on January 2014 DEIS submission to NIRB and NWB. DEIS Plain Language Summary included.
March 27, 2014	General public	NIRB held community information sessions for the Project's DEIS and were available to the public for questions and information sharing. Note – Sabina representatives were unable to attend due to flight cancellations.
June 16, 2015	General public	Public meeting – Project update and FEIS submission overview.
March 5, 2016	Hamlet of Kugaaruk Kugaaruk HTO	Emailed letter re: Sabina's FEIS submission.
April 11-12, 2016	Hamlet of Kugaaruk Representative Kugaaruk HTO Representative	Representatives from the Hamlet of Kugaaruk and Kugaaruk HTO participated in meetings and a Back River Project site visit hosted by Sabina.
July 6, 2016	Kugaaruk HTO	Project update re: NIRB final hearing report.
July 6, 2016	Hamlet of Kugaaruk	Project update re: NIRB final hearing report.
July 6, 2016	General Public	Public meeting - Project update re: NIRB final hearing report.
January 23, 2017	Hamlet of Kugaaruk	Letter – Update on January 12, 2017 INAC Minister's decision and thank you for providing letter of support.
April 19, 2017	General Public	Public meeting - Project update and FEIS Addendum overview.
September 2017	Hamlet of Kugaaruk	Letter – Project update and thank you for providing letter of support.
Yellowknife / Other Locations in the Northwest Territories		
November 15, 2012	Yellowknives Dene First Nation representatives	Project overview.
November 16, 2012	General public	Public meeting – Project overview.

February 20, 2013	General public	Sabina representatives participated in NIRB's scoping meeting for the Project and were available to the public for questions and information sharing.
November 12, 2013	Tlicho Government / Kwe Beh Working Group representatives	Project overview.
November 13, 2013	Deninu K'ue First Nation representatives	Project overview.
November 13, 2013	General public	Public meeting - Project overview/update.
November 14, 2013	Yellowknives Dene First Nation representative (T. Slack)	Project update.
November 15, 2013	North Slave Métis Alliance representatives	Project overview.
January 24, 2013	Yellowknives Dene First Nation (Attn: Todd Slack)	Delivery of two USB memory sticks with full digital versions of Sabina's DEIS submission included on each.
January 24, 2013	Tlicho Government / Kwe Beh Working Group (Attn: Henry Zoe and Sonny Zoe)	Delivery of two USB memory sticks with full digital versions of Sabina's DEIS submission included on each.
January 24, 2013	North Slave Métis Alliance (Attn: Eric Binion)	Delivery of two USB memory sticks with full digital versions of Sabina's DEIS submission included on each.
January 24, 2013	Deninu K'ue First Nation (Attn: Chief Louis Balsillie and Stephen Cuthbert)	Delivery of two USB memory sticks with full digital versions of Sabina's DEIS submission included on each.
April 1, 2014	General public	Sabina representatives participated in NIRB's community information sessions for the Project's DEIS and were available to the public for questions and information sharing.
May 8, 2014	Yellowknives Dene First Nation	Email update re: DEIS / NIRB regulatory process.
May 8, 2014	Tlicho Government / Kwe Beh Working Group	Email update re: DEIS / NIRB regulatory process.
May 8, 2014	North Slave Métis Alliance	Email update re: DEIS / NIRB regulatory process.
May 8, 2014	Lutsel K'e Dene First Nation	Email update re: DEIS / NIRB regulatory process.
May 8, 2014	Deninu K'ue First Nation	Email update re: DEIS / NIRB regulatory process.
May 8, 2014	Dene Nation	Email update re: DEIS / NIRB regulatory process.
July 24, 2014	Yellowknives Dene First Nation	Email update re: Sabina's DEIS IR responses.
July 24, 2014	Tlicho Government / Kwe Beh Working Group	Email update re: Sabina's DEIS IR responses.
July 24, 2014	North Slave Métis Alliance	Email update re: Sabina's DEIS IR responses.
July 24, 2014	Lutsel K'e Dene First Nation	Email update re: Sabina's DEIS IR responses.
July 24, 2014	Deninu K'ue First Nation	Email update re: Sabina's DEIS IR responses.
July 24, 2014	Dene Nation	Email update re: Sabina's DEIS IR responses.
July 25, 2014	North Slave Métis Alliance representative (Matt Hoover)	Phone call to discuss Sabina's DEIS Information Request responses and future regulatory timelines/requirements.
May 28, 2015	Yellowknives Dene First Nation	Emailed letter and notice of June 15, 2015 public meeting in Yellowknife.

May 28, 2015	Tlicho Government	Emailed letter and notice of June 15, 2015 public meeting in Yellowknife.
May 28, 2015	Deninu Kue First Nation	Emailed letter and notice of June 15, 2015 public meeting in Yellowknife.
May 28, 2015	North Slave Métis Alliance	Emailed letter and notice of June 15, 2015 public meeting in Yellowknife.
May 28, 2015	Lutsel K'e Dene First Nation	Emailed letter and notice of June 15, 2015 public meeting in Yellowknife.
June 15, 2015	General public	Public meeting - Project update and FEIS submission overview.
February 8, 2016	North Slave Métis Alliance	Project / FEIS update meeting.
March 5, 2016	Yellowknives Dene First Nation	Emailed letter re: Sabina's FEIS submission.
March 5, 2016	Tlicho Government / Kwe Beh Working Group	Emailed letter re: Sabina's FEIS submission.
March 5, 2016	North Slave Métis Alliance	Emailed letter re: Sabina's FEIS submission.
March 5, 2016	Lutsel K'e Dene First Nation	Emailed letter re: Sabina's FEIS submission.
July 8, 2016	North Slave Métis Alliance	Project update re: NIRB final hearing report.
July 8, 2016	General Public	Public meeting - Project update re: NIRB final hearing report.
April 17, 2017	General public	Public meeting - Project update and FEIS Addendum overview.
April 25, 2017	Yellowknives Dene First Nation Representatives	Project update and FEIS Addendum overview.
Other (e.g. northern trade shows and conferences, SEMCs, newsletters)		
February 13-15, 2012	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Trade Show in Cambridge Bay.
March 28, 2012	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Socio-Economic Monitoring Committee meeting in Cambridge Bay.
April 16-19, 2012	Various community, government, and industry stakeholders participated	Sabina participated in the Nunavut Mining Symposium in Iqaluit.
September 25-27, 2012	Various community, government, and industry stakeholders participated	Sabina participated in the Nunavut Trade Show in Iqaluit.
October 30-31, 2012	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Stakeholders Meeting in Cambridge Bay to discuss training and labour market needs in the Kitikmeot Region.
November 13-15, 2012	Various community, government, and industry stakeholders participated	Sabina participated in the Yellowknife Geoscience Forum.
March 30, 2013	Various community, government, industry, and other stakeholders	Sabina issued the winter 2013 edition of its Project newsletter 'Back River News' via email and at various locations in the Kitikmeot communities.

February 11-13, 2013	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Trade Show in Cambridge Bay.
April 8-11, 2013	Various community, government, and industry stakeholders participated	Sabina participated in the Nunavut Mining Symposium in Iqaluit.
June 28, 2013	Various community, government, industry, and other stakeholders	Sabina issued the summer 2013 edition of its Project newsletter 'Back River News' via email and at various locations in the Kitikmeot communities.
September 12, 2013	Various community, government, and industry stakeholders participated	Sabina participated in a meeting on Community Readiness in the Kitikmeot Region, hosted by the Kitikmeot Inuit Association and Canadian Northern Economic Development Agency, in Cambridge Bay.
September 24-26, 2013	Various community, government, and industry stakeholders participated	Sabina participated in the Nunavut Trade Show in Iqaluit.
October 9, 2013	Various community, government, industry, and other stakeholders	Sabina provided an email update on the results of its pre-feasibility study for the Back River Project.
October 18, 2013	Various community, government, and industry stakeholders participated	Sabina participated (via teleconference) in the Kitikmeot Stakeholders Working Group meeting in Cambridge Bay to discuss training and employment activities and opportunities in the Kitikmeot Region.
November 15, 2013	Various community, government, industry, and other stakeholders	Sabina issued the fall 2013 edition of its Project newsletter 'Back River News' via email and at various locations in the Kitikmeot communities.
November 19-21, 2013	Various community, government, and industry stakeholders participated	Sabina participated in the Yellowknife Geoscience Forum.
November 20-21, 2013	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Socio-Economic Monitoring Committee meeting in Cambridge Bay.
December 3, 2013	Various community, government, and industry stakeholders participated	Sabina participated (via teleconference) in the Kitikmeot Stakeholders Working Group meeting in Cambridge Bay to discuss training and employment activities and opportunities in the Kitikmeot Region.
January 22, 2014	Various community, government, industry, and other stakeholders	Sabina issued the spring 2014 edition of its Project newsletter 'Back River News' via email and at various locations in the Kitikmeot communities.
February 10-12, 2014	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Trade Show in Cambridge Bay.
February 12, 2014	Various community, government, industry, and other stakeholders	Sabina provided an email update on the DEIS conformity decision it received for the Back River Project.
February 18, 2014	Various community, government, and industry stakeholders participated	Sabina participated (via teleconference) in the Kitikmeot Stakeholders Working Group meeting in Cambridge Bay to discuss training and employment activities and opportunities in the Kitikmeot Region.

March 4, 2014	Various community, government, industry, and other stakeholders	Sabina provided an email update on the updated mineral resource estimate it produced for the Back River Project.
April 7-10, 2014	Various community, government, and industry stakeholders participated	Sabina participated in the Nunavut Mining Symposium in Iqaluit.
April 28, 2014	Various community, government, industry, and other stakeholders	Sabina provided an email update on recent agreements signed between Sabina and the KIA for the Back River Project.
June 5, 2014	Various community, government, and industry stakeholders participated	Sabina participated (via teleconference) in the Kitikmeot Stakeholders Working Group meeting in Cambridge Bay to discuss training and employment activities and opportunities in the Kitikmeot Region.
October 7-9, 2014	Various community, government, and industry stakeholders participated	Sabina participated in the Nunavut Trade Show in Iqaluit.
October 22, 2014	Various community, government, and industry stakeholders participated	Sabina participated (via teleconference) in the Kitikmeot Stakeholders Working Group meeting in Cambridge Bay to discuss training and employment activities and opportunities in the Kitikmeot Region.
November 13-19, 2014	Various community and government stakeholders participated	Sabina participated in the Nunavut Impact Review Board's Technical Meeting and Pre-Hearing Conference for the Back River Project in Cambridge Bay.
November 25-27, 2014	Various community, government, and industry stakeholders participated	Sabina participated in the Yellowknife Geoscience Forum.
January 13, 2015	Various community, government, industry, and other stakeholders	Email update to Sabina email distribution list re: environmental assessment progress and anticipated FEIS submission.
January 27, 2015	Various community, government, industry, and other stakeholders	Sabina issued the winter 2015 edition of its Project newsletter 'Back River News' via email and at various locations in the Kitikmeot communities.
February 4, 2015	Various government and KIA representatives participated	Sabina participated in a meeting in Cambridge Bay to establish a Terms of Reference for the Back River Socio-Economic Monitoring Committee Working Group.
February 9-11, 2015	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Trade Show in Cambridge Bay.
April 13-16, 2015	Various community, government, and industry stakeholders participated	Sabina participated in the Nunavut Mining Symposium in Iqaluit.
April 21-23, 2015	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Mayors' Conference in Cambridge Bay.
September 14, 2015	Various community, government, industry, and other stakeholders	Email update to Sabina email distribution list re: Initial Project Feasibility Study.

November 3-4, 2015	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Socio-Economic Monitoring Committee meeting in Cambridge Bay.
December 9, 2015	Various community, government, industry, and other stakeholders	Email update to Sabina email distribution list re: FEIS submission.
February 9, 2016	Selected youth from the Kitikmeot Region	Sabina met with selected youth from the Kitikmeot Region who were participating in the Kitikmeot Trade Show, to discuss education and career opportunities.
February 9-10, 2016	Various community, government, and industry stakeholders participated	Sabina participated in and presented a Project update at the Kitikmeot Trade Show in Cambridge Bay.
February 17, 2016	Various community, government, industry, and other stakeholders	Sabina issued the winter 2016 edition of its Project newsletter 'Back River News' via email and at various locations in the Kitikmeot communities.
April 4-6, 2016	Various community, government, and industry stakeholders participated	Sabina participated in the Nunavut Mining Symposium in Iqaluit.
April 19-21, 2016	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Mayors' Conference in Cambridge Bay.
April 25-30, 2016	Various community and government stakeholders participated	Sabina participated in the Nunavut Impact Review Board's Final Hearing for the Back River Project in Cambridge Bay.
November 15-17, 2016	Various community, government, and industry stakeholders participated	Sabina participated in the Yellowknife Geoscience Forum in Yellowknife.
November 30-December 1, 2016	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Socio-Economic Monitoring Committee meeting in Cambridge Bay.
December 2, 2016	Back River Socio-Economic Monitoring Working Group Members	Sabina participated in a Back River Socio-Economic Monitoring Working Group meeting in Cambridge Bay.
February 6-8, 2017	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Trade Show in Cambridge Bay.
April 3-6, 2017	Various community, government, and industry stakeholders participated	Sabina participated in the Nunavut Mining Symposium in Iqaluit.
May 31-June 3, 2017	Various community and government stakeholders participated	Sabina participated in the Nunavut Impact Review Board's FEIS Addendum Final Hearing for the Back River Project in Cambridge Bay.
September 14-15, 2017	Various community, government, and industry stakeholders participated	Sabina participated in a Socio-Economic Monitoring Workshop held in Iqaluit.
October 3-5, 2017	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Mayors' Conference in Cambridge Bay.
November 14-16, 2017	Various community, government, and industry stakeholders participated	Sabina participated in the Yellowknife Geoscience Forum in Yellowknife.

November 21-23, 2017	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Economic Development Strategy Workshop hosted by the Kitikmeot Chamber of Commerce in Cambridge Bay
March 19-20, 2018	Various community, government, and industry stakeholders participated	Sabina participated in the Kitikmeot Socio-Economic Development Meeting in Cambridge Bay
March 20, 2018	Various community, government, and industry stakeholders participated	Sabina participated in the Back River Socio-Economic Meeting Working Group in Cambridge Bay
May 2, 2018	Various community, government and Industry stakeholders participated	Sabina participated in the Community Meeting for the Nunavut Water Board during Type A Water Licence Technical Meetings
May 10, 2019	Various community, government and Industry stakeholders participated	Sabina participated in the KIA's Stakeholders Working Group in Cambridge Bay
August 3, 2018	Hamlet of Kugluktuk	Sabina met with the Hamlet to discuss infrastructure projects in Kugluktuk
August 8, 2018	Various community, government and Industry stakeholders participated	Sabina participated in the Community Meeting for the Nunavut Water Board during Type A Water Licence Final Hearing in Cambridge Bay
September 18, 2018	Various community, government and Industry stakeholders participated	Sabina participated in the KIA's Stakeholders Working Group in Cambridge Bay
September 19, 2018	Various community, government and Industry stakeholders participated	Sabina participated in the Kitikmeot Mayors Meeting In Cambridge Bay
October 17, 2018	Hamlet of Cambridge Bay	Sabina met with the SAO for a Community Update
October 18, 2018	Various community, government and Industry stakeholders participated	Sabina participated in the Kitikmeot Inuit Association Annual General Meeting in Cambridge Bay

January 29, 2019	Hamlet of Kugluktuk	Met with the Hamlet of Kugluktuk in Vancouver,BC to discuss Infrastructure Projects
January 29, 2019	Various community, government and Industry stakeholders participated	Sabina hosted a breakfast in Vancouver during RoundUp 2019 for Various community, government and Industry stakeholders
February 12-13, 2019	Various community, government and Industry stakeholders participated	Sabina participated in the Kitikmeot Trade Show's 20th Anniversary on Cambridge Bay
March 6, 2019	Kitikmeot Inuit Association	Sabina and KIA 2019 Presidents Meeting
April 1 – 4, 2019	Various community, government and Industry stakeholders participated	Sabina participated in the Nunavut Mining Symposium in Iqaluit
??	Various community, government and Industry stakeholders participated	Merles Arctic Council Trip Presentation
April 11-12, 2019	Kitikmeot Socio-Economic Monitoring Committee	Sabina participated in the 2019 KSEMC and Back River SEMCWG in Cambridge Bay
May 25 – 31, 2019	Kitikmeot Community Tour	Sabina hosted a Kitikmeot Tour. Visiting each of the five communities, holding public meetings as well as delivering 80 Leitz Microscopes and hosting workshops in each school regarding the Microscopes
September 9, 2019	Hamlet of Kugluktuk	Sabina met with the Hamlet to discuss the Regional Wealth Creation Fund
September 9, 2019	Kugluktuk	Sabina hosted a public meeting to consult on possible upcoming project changes
September 10, 2019	Cambridge Bay	Sabina met with NIRB and NPC to discuss possible upcoming project changes

September 10, 2019	Cambridge Bay	Sabina hosted a public meeting to consult on possible upcoming project changes
September 11, 2019	Kugaaruk	Sabina presented at the KIA Board Meeting
September 11, 2019	Gjoa Haven	Sabina met with Nunavut Water Board to discuss possible upcoming project changes