Affaires autochtones et Développement du Nord Canada

NWB File: 2BE-GEO1015

CIDMS #: 640442

Water Resources Division Nunavut Regional Office Iqaluit, NU X0A 0H0

Feb 28, 2013

Re: 2BE-GEO1015 – Amendment Application #2 – George Lake – Back River Project – Sabina Gold & Silver Corp.

Please be advised that Aboriginal Affairs and Northern Development Canada (AANDC) has completed a review of the amendment application for water license 2BE-GEO1015 (George Lake) submitted by Sabina Gold and Silver Corp. The NWB circulated the renewal application for comments on February 8, 2013. All associated documents related to this amendment application posted on the NWB ftp site under 2BE-GEO1015 were included in my review (See attached Technical Review Memo).

Should you have any questions or comments, please do not hesitate to contact me at (867) 979-4282 or by email at lan.Parsons@aandc.gc.ca.

Sincerely,

Original signed by

lan Parsons Regional Coordinator

Cc. Murray Ball, Manager of Water Resources – AANDC, Nunavut Regional Office



Technical Review Memorandum

To: Phyllis Beaulieu – Manager of Licensing, Nunavut Water Board

From: Ian Parsons – Regional Coordinator, AANDC.

Re: 2BE-GEO1015 – Amendment Application #2 – George Lake – Back River Project – Sabina Gold & Silver Corp.

Background

The George Lake project is located in the Kitikmeot Region of Nunavut 100km South of Bathurst Inlet. The George Lake Project is part of the much larger Back River Project which includes several other properties. Existing facilities at George Lake consist of a gravel airstrip, 5 small structures (for office, sleeping quarters and kitchen) and a building for maintenance and storage. Possible Temporary camps will be supported by George Lake main camp. Goose Lake camp will also provide support for George Camp if needed.

The amendment application activities include:

1) Extending project boundaries for exploration/drilling activities.

Recommendations/Comments

AANDC has no issue with amendment application. AANDC, however, has some minor comments which are listed below:

- AANDC recommends, to avoid any confusion, that the proponent fill out a complete application/questionnaire for all new application types (amendments, renewals, etc) and not state that only applicable sections are filled out and to refer to old applications for other information.
- 2) AANDC recommends that the proponent submit to the NWB, when available, the exact locations of any temporary camp structures to be constructed and water sources to be used.
- 3) The Spill Contingency Plan should be revised to include the new AANDC Manager of Field Operations, Erik Allain, as the primary AANDC contact



for the reporting of spills. The manager can be reached by telephone at (867) 975-4295 or fax at (867) 975-6445.

- 4) AANDC recommends that the Spill Contingency Plan include the contact numbers for personnel involved in spill prevention and remediation activities.
- 5) AANDC recommends that the A&R Plan include the contact numbers for personnel involved in any abandonment and reclamation activity.
- 6) AANDC recommends that the Proponent remove all hazardous materials/waste oil from the site on a regular basis to prevent the over accumulation of these materials. All transfer of this type of waste must be in accordance with the Government of Nunavut's Environmental Guideline for General Management of Hazardous Waste - January, 2002. In addition hazardous wastes should be stored within a lined secondary containment structure or other secured structure to prevent any off site impacts.
- 7) AANDC also recommends that the proponent be advised that in order to transport hazardous wastes in Nunavut the waste generator must be registered with the Government of Nunavut, Environmental Protection Division and provide the final destination for the hazardous wastes (approved registered facility). Hazardous waste/waste oils must be disposed of at an approved facility outside of the Territory of Nunavut (because no known facilities exist within Nunavut).
- 8) AANDC recommends that the Proponent be required to submit copies of all manifest forms related to the transport of hazardous waste/waste oil as part of the Annual Report for this site.

AANDC recommends that Sabina Gold and Silver Corp. provide the Nunavut Water Board with all of the outstanding information referred to above in support of the Amendment Application process.

Cc. Murray Ball, Manager of Water Resources – AANDC, Nunavut Regional Erik Allain, Manager Field Operations— AANDC, Nunavut Regional Office

