



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

NWB File: 2BE-GEO1015
CIDMS #: 907678

April 13, 2015

**Re: 2BE-GEO1015 – Renewal Application – 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 renewal application for water licence 2BE-GEO1015 (George Lake) submitted by Sabina Gold and Silver Corp. The NWB circulated the renewal application for comments on March 7, 2015. All associated documents related to this renewal 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 Ian.Parsons@aandc.gc.ca.

Sincerely,

Original signed by

Ian Parsons
Regional Coordinator, B.Sc.

Cc. Karen Costello, Director Resource Management – AANDC, Nunavut
Regional Office
Erik Allain, Manager Field Operations– 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 – Renewal Application – 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. Goose Lake camp will also provide support for George Camp if needed.

Recommendations/Comments

AANDC has no issue with the renewal application and the following comments and recommendations are offered for the Board's consideration:

- 1) The Spill Contingency Plan should be updated 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.
- 2) AANDC recommends that the Spill Contingency Plan include the contact numbers for personnel involved in spill prevention and remediation activities.
- 3) AANDC recommends that the Abandonment and Restoration Plan include the contact numbers for personnel involved in any abandonment and reclamation activity.



- 4) 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 transfers of this type of waste must be in accordance with the Government of Nunavut's [Environmental Guidelines 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.
- 5) AANDC also recommends that the proponent be advised that in order to transport hazardous wastes in Nunavut the waste generator (Sabina) 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 Nunavut (as there are no registered facilities within the territory).
- 6) 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.