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February 27, 2020

Nunavut Water Board Box 119 Gjoa Haven, NU XOB 1JO

Kugluktuk 22222

Sent via email: licensing@nwb-oen.ca

Bathurst Inlet Kingaok

Bay Chimo

Umingmaktok

222222

Re: Kitikmeot Inuit Association comments on 2BE-GEO1520 Renewal Application

To whom is may concern,

The Kitikmeot Inuit Association (KitIA)would like to thank the Nunavut Water Board for the opportunity to comment on Sabina Gold and Silver Corp.'s application to renew water license 2BE-GEO1520. KitIA and Sabina have signed a Framework Agreement for activities associated with the George Camp and Back River project. This framework agreement has an expiry date of April 20, 2038. The KIA does not support a water license term that surpasses that date. If a longer term than a typical 5 year license is authorized by the Nunavut Water Board, KitIA has the following comments to prevent KitIA and CIRNAC from being under-secured for reclamation:

Cambridge Bay Ikaluktutiak 22222222

1. security reviews are completed on a regular basis, i.e. every 3 years.

Gjoa Haven Okhoktok 2. security reviews are completed prior to scope changes beyond what the current camp configuration and resources set up related to surface drilling. Such changes would include new infrastructure development or a bulk sample, as examples.

Taloyoak

3. scope changes require notice to NIRB with accompanying proposed reclamation estimate for review by the parties.

Kugaaruk 22222 Again, KitlA thanks the Nunavut Water Board for the opportunity to provide comments on the renewal application.

Regards,

Geoff Clark,

Director of Lands, Environment and Resources

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Kitikmeot Inuit Association