

BACK RIVER PROJECT

2019 Annual Report for Water Licence 2BE-GEO2025

Prepared by Sabina Gold and Silver Corp.

Prepared for Nunavut Water Board

March 2020

BACK RIVER PROJECT

2019 2BE-GEO2025 Annual Report

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Acronyms

CIRNAC Crown Indigenous Relations and Northern Affairs Canada

KIA Kitikmeot Inuit Association

The Licence Water Licence 2BE-GEO2025 (previously 2BE-GEO1520)

NIRB Nunavut Impact Review Board

MLA Marine Laydown Area

NWB Nunavut Water Board

The Project Back River Project

Sabina Gold & Silver Corp.

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Executive Summary - English

Sabina Gold & Silver Corp. (Sabina) has filed its Annual Report on its activities during 2019 under Water Licence No. 2BE-GEO2025 (the Licence) issued by the Nunavut Water Board. As set out in Part B, Item 2 of the Licence, the report includes information with respect to the following topics:

- A summary report of water use and waste disposal;
- A list of unauthorized discharges and a summary of follow-up actions taken;
- Any revisions to plans under this Licence;
- A description of all progressive and or final reclamation work undertaken, if any, including photographic records of site conditions before, during and after completion of operations;
- A report of any artesian flow occurrences;
- Quantities of water used and waste disposed of;
- Any temporary camp locations;
- Any other details on water use or waste disposal requested by the Board.

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1. Introduction

This report to the Nunavut Water Board (NWB) has been prepared to summarize the project activities and monitoring undertaken by Sabina Gold and Silver Corp. (Sabina) during 2019, in accordance with Part B, Item 2 of License 2BE-GEO2025 (the Licence; previously 2BE-GEO1520). This License was renewed without change on March 10th, 2020 and will expire on May 29th, 2025. The NWB Annual Report Form can be found in Appendix A of this report.

The George Lake camp was not operational in 2019 and no freshwater was used under this Licence in 2019. The MLA camp was used to Back River Project pre-Construction activities. As such, information in this report is complimented by that presented in Sabina's 2019 Annual Report for Water Licence 2AM-BRP1831. Freshwater water withdrawal details for the Marine Laydown Area (MLA) camp are presented in the annual report for Water Licence 2AM-BRP1831. Waste management included the discharge of greywater at the MLA.

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2. Annual Report per Part B, Item 2

This section of the report has been constructed to address each of the requirements of Part B, Item 2 of the Licence. For ease of comparison, each subheading corresponds directly with the identically alphabetized subheading of Part B, Item 2 of Water Licence 2BE-GEO2025.

A. SUMMARY OF WATER USE AND WASTE DISPOSAL

No water was used under this Licence in 2019. The George Camp remained closed throughout 2019 and the MLA camp water usage was supplied under Water Licence 2AM-BRP1831 and is reported within that annual report for that licence.

Waste generation under this Licence consisted of camp greywater discharge at the MLA. Greywater was discharge to a natural sump located at a distance of at least 31 metres above the ordinary high water mark of any water body in a location where direct flow into a waterbody is not possible and no additional impacts are created. At the MLA camp, pacto toilets are used and collected human waste is incinerated in the camp incinerator along with other burnable non-hazardous waste. Any hazardous waste and non-burnable materials are shipped off site for disposal at a licenced facility. Details of 2019 Project waste disposal are found the annual report for Water Licence 2AM-BRP1831.

B. UNAUTHORIZED DISCHARGES

No hydrocarbon spills to water or triggering the NWT/NU spill reporting thresholds occurred in 2019.

C. MANAGEMENT PLAN REVISIONS

Sabina made revisions to the following Management Plans in 2019:

- Comprehensive Spill Contingency Plan, dated June 2018; and
- Abandonment and Restoration Plan George Camp and Exploration Project, dated January 2019.

These revised plans were provided to the NWB with the submission of the Licence renewal application and the NWB approved these plans with the issuance of Water Licence 2BE-GEO2025.

D. PROGRESSIVE AND FINAL RECLAMATION

No reclamation activities related to this Licence were undertaken in 2019.

E. ARTESIAN FLOWS

No drilling took place under this licence in 2019 and no artesian flows were intercepted.

F. INFORMATION REQUESTS AND RESULTS OF MONITORING PROGRAM

No water was used for any purposes under this Licence in 2019. No water was discharged from monitoring station GEO-1 (the George Camp Bulk Fuel Storage Facility) in 2019. Discharges from MLA fuel berms are detailed in the annual report for Water Licence 2AM-BRP1831.

No inspections were conducted by CIRNAC specific to this Licence in 2019. However, see inspections conducted under related Water Licence 2AM-BRP1831, which are discussed in the Annual Report for that Licence.

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G. QUANTITY OF WATER USE FROM INUIT OWNED LANDS

No water was withdrawn under this Licence from water sources located on Inuit Owned Lands in 2019.

H. QUANTITY OF WATER USE FROM CROWN LANDS

No water was withdrawn under this Licence from water sources located on Crown Land in 2019.

I. WASTE DISPOSAL

Waste generated under this Licence in 2019 included greywater discharge from the MLA camp. On-site waste disposal locations are provided in Table 2.I-1. MLA camp greywater is discharged to a sump located at a distance of at least 31 metres above the ordinary high water mark of any water body in a location where direct flow into a waterbody is not possible and no additional impacts are created.

At the MLA camp, pacto toilets are used and human waste is collected and disposed of in camp incinerators along with all burnable non-hazardous waste. Burnable non-hazardous waste includes kitchen refuse, paper, recyclable food containers, cardboard and inert wood as per Part D Item 3 of the Licence.

Non-burnable non-hazardous waste includes plastic and metal food containers, fuel drums, other plastic or metal containers, and treated wood as well as incinerator ash. Any of these items which are not destined for re-use on site are transported off site for recycling or appropriate disposal. With the exception of greywater, no other wastes were generated under thei Licence in 2019. Wastes generated at the MLA are outlined in the annual report for Water Licence 2AM-BRP1831.

Records of all waste backhauled are available on site to the Inspector.

Table 2.I-1. Waste Disposal Locations

Source	Location
MLA Greywater	N 66°38′37" W -107°41′34"
MLA Incinerator	N 66°38'36" W -107°41'33"

J. TEMPORARY CAMP LOCATION(S)

No temporary camps were established under this Licence in 2019.

K. BOARD REQUESTS RE: WATER USE AND WASTE DISPOSAL

No requests related to water use or waste disposal were made by the Board in 2019.

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Appendix A NWB Annual Report Form

BACK RIVER PROJECT 2-1

NWB Annual Report	Year being reported: Select ▼ 2019							
License No: 2BE-GEO2025	Issued Date: March 10, 2020 Expiry Date: May 29, 2025							
Project Name:	GEORGE LAKE, BACK RIVER PROJECT							
Licensee: SAB	INA GOLD AND SILVER CORP							
Mailing Address:	#1800 - 555 Burrard Street, Box 220, Vancouver, BC, V7X 1M7							
	r filing Annual Report (if different from Name of Licensee please clarify he two entities, if applicable):							
SABINA GOLD AN	D SILVER CORP							
General Background Information	on on the Project (*optional):							
Licence Requirements: the licensee must provide the following information in accodance with Part B ▼ Item 2 ▼								
A summary report of water use and waste disposal activities, including, but not limited to: methods of obtaining water; sewage and greywater management; drill waste management; solid and hazardous waste management.								
Water Source(s): Water Quantity:	N/A 45 Quantity Allowable Domestic (cu.m/day) 0 Actual Quantity Used Domestic (cu.m/yr) 130 Quantity Allowable Drilling (cu.m/day) Total Quantity Used Drilling (cu.m/yr)							
	2.G, and 2.I of the Annual Report.							
Spill No : 0	es and a summary of follow-up actions taken. (as reported to the Spill Hot-line)							

Results of any additional sampling and/or analysis that was requested by an Inspector

	No additional sampling requested by an Inspector or the Board	•			
,	Additional Details: (date of request, analysis of results, data attached, etc)				
Any other de reported.	etails on water use or waste disposal requested by the Board by November 1 o	of the year being			
	No additional sampling requested by an Inspector or the Board	▼			
	Additional Details: (Attached or provided below)				
Any respons	ses or follow-up actions on inspection/compliance reports				
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Inspection Report received by the Licensee (Date):	▼			
	Additional Details: (Dates of Report, Follow-up by the Licensee)				
	See Section 2.G of the Annual Report				
Any addition	nal comments or information for the Board to consider				
Date Submitt Submitted/Pi Contact Info	repared by: Merle Keefe/Katsky Venter				