

BACK RIVER PROJECT

2020 Annual Report for Water Licence 2BE-GEO2025

Prepared by Sabina Gold and Silver Corp.

Prepared for Nunavut Water Board

March 2021

BACK RIVER PROJECT

2020 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
NIRB Nunavut Impact Review Board

MLA Marine Laydown Area

NWB Nunavut Water Board

The Project Back River Project

Sabina Gold & Silver Corp.

ii MARCH 2020

Executive Summary - English

Sabina Gold & Silver Corp. (Sabina) has filed its Annual Report on its activities during 2020 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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1-2 MARCH 2020

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 2020, 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 2020 and no freshwater was used under this Licence. 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 2020 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. The MLA was not opened in 2020 and no water was used or discharged at that location.

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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 2020. 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 2020 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 2020.

C. MANAGEMENT PLAN REVISIONS

Sabina did not make any revisions to any management plans applicable to this Licence in 2020.

D. PROGRESSIVE AND FINAL RECLAMATION

No reclamation activities related to this Licence were undertaken in 2020.

E. ARTESIAN FLOWS

No drilling took place under this licence in 2020 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 2020. No water was discharged from monitoring station GEO-1 (the George Camp Bulk Fuel Storage Facility) in 2020. 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 2020.

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 2020.

H. QUANTITY OF WATER USE FROM CROWN LANDS

No water was withdrawn under this Licence from water sources located on Crown Land in 2020.

2-4 MARCH 2020

I. WASTE DISPOSAL

On-site waste disposal locations are provided in Table 2.I-1. No waste was generated or disposed of under this Licence in 2020.

J. TEMPORARY CAMP LOCATION(S)

No temporary camps were established under this Licence in 2020.

K. BOARD REQUESTS RE: WATER USE AND WASTE DISPOSAL

No requests related to water use or waste disposal were made by the Board in 2020.

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Appendix A NWB Annual Report Form

BACK RIVER PROJECT 2-1

NWB Annual Report			Year	being repo	orted:	Select	•	2020	
License No: 2BE-GEO2025		5		ed Date: ry Date:	March 10 May 29,		\Box		
		_							
Pr	roject Name:	: <u>G</u>	GEORGE LAKE, BACK RIVER PROJECT						
Lie	censee:	SABINA	A GOLD AND SILV	ER CORP					
Ma	Mailing Address:			#1800 - 555 Burrard Street, Box 220, Vancouver, BC, V7X 1M7					
	Name of Company filing Annual Report (if different from Name of Licensee please clarify relationship between the two entities, if applicable):								
	SABINA GOLD			•					
General Backgr	round Inforn	nation	on the Project (*	optional):					
Licence Require	Part B		ee must provide	the follow	ing inform	nation in ac	codance	with	
A summary rep	ort of water	use ar	nd waste dispos	al activities	, includin	g, but not l	limited to:	methods of	
		nd grey	water managen	ent; drill w	aste mana	agement; s	olid and I	nazardous	
waste managen	menτ. ′ater Source(s)·	N/A						
	ater Quantity	<i>y</i> :	45 0 130 0	Actual C	Quantity Us Allowable	e Domestic sed Domest e Drilling (cu ed Drilling (c	tic (cu.m/yı ı.m/day)		
W	✓ aste Manage ✓ Solid Was ✓ Sewage ✓ Drill Wass ✓ Greywate ✓ Hazardou	ste Dispo: te er	and/or Disposal sal						
	Other:								
	dditional Deta		, and 2.I of the Ai	nnual Repor	t.				
			and a summary						
•	oill No.: (ate of Spill: [(as r	eported to th	ne Spill Ho	t-line)			

	Date of Notification to an Inspector: N/A Additional Details: (impacts to water, mitigation measures, short/long term monitoring, etc)	
Revisio	ns to the Spill Contingency Plan	
IXC VISIC	SCP submitted and approved - no revision required or proposed	
	Additional Details:	
	See Section 2.C of Annual Report.	
Revisio	ns to the Abandonment and Restoration Plan	
	AR plan submitted and approved - no revision required or proposed	
	Additional Details:	
	See Section 2.C of Annual Report.	
Progres	sive Reclamation Work Undertaken	
	Additional Details (i.e., work completed and future works proposed)	
	See Section 2.D of Annual Report.	
Results	of the Monitoring Program including:	
Results	of the Monitoring Program including: The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of	each
Results	of the Monitoring Program including: The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of location where sources of water are utilized;	each
Results	The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of	each
Results	The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of location where sources of water are utilized;	each
Results	The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of location where sources of water are utilized; Details attached	each
Results	The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of location where sources of water are utilized; Details attached Additional Details:	
Results	The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of location where sources of water are utilized; Details attached Additional Details: See Section 2.F of the Annual Report. The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of location where wastes associated with the licence are deposited;	
Results	The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of location where sources of water are utilized; Details attached Additional Details: See Section 2.F of the Annual Report. The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of location where wastes associated with the licence are deposited; Details attached	
Results	The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of location where sources of water are utilized; Details attached Additional Details: See Section 2.F of the Annual Report. The GPS Co-ordinates (in degrees, minutes and seconds of latitude and longitude) of location where wastes associated with the licence are deposited; Details attached Additional Details:	each

				•					
г	Additional Det	ails: (date	of request	, analysis o	of results, da	ata attached, e	etc)		
Any other de	tails on water	use or w	aste dispo	osal reque	sted by the	Board by No	ovember 1	of the y	/ear
being reporte	ed.								
	No additional san	npling reque	ested by an Ins	spector or the	Board			•	
_	Additional Det	ails: (Atta	ched or pro	vided belo	w)				
Any respons	es or follow-u	p actions	on inspec	ction/com	pliance rep	orts			
	Inspection Report							•	
r	Additional Details: (Dates of Report, Follow-up by the Licensee)								
See Section 2.G of the Annual Report									
Any addition	al comments	or inform	ation for t	he Board	to consider	r			
_									
Date Submitt		March 2, Merle Kee	2020 efe/Katsky	Venter					
Contact Info	rmation:	Tel: Fax:	•						
		email: m	nkeefe@sal	<u>binagoldsil</u>	ver.com				