

Environmental Assessment North
Environmental Protection Operations (EPO)
Qimugjuk Building 969
P.O. Box 1870
Iqaluit, NU X0A 0H0
Tel: (867) 975-4631
Fax: (867) 975-4645

11 March 2012

EC file: 4703 001 114
NWB file: 2BE-GEO1015

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
PO Box 119
Gjoa Haven, NU X0B 1J0

Via email: licensing@nunavutwaterboard.org

RE: 120210 2BE-GEO1015 Amendment Application Review

Environment Canada (EC) has reviewed the information submitted with the above-mentioned amendment application as submitted to the Nunavut Water Board (NWB). The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act 1999*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Sabina Gold & Silver Corp. (Sabina) is proposing to amend water license 2BE-GEO1015 to allow for the extension of the project area boundaries to allow mineral exploration and additional drilling, and resupply activities at Bathurst Inlet to be supported by the George camp. Sabina may also establish temporary camps to support exploration and resupply in areas beyond 20 km of the George camp. This amendment and the associated activities would increase the volume of water used on a daily basis from 143 m³/day to 175 m³/day.

Based on a review of the proposed exemption, EC provides the following comments for the NWB's consideration:

General

- The proponent shall not deposit, nor permit the deposit of chemicals, sediment, wastes, or fuels associated with the project into any water body. According to the *Fisheries Act*, Section 36 (3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- EC does not foresee any major issues with the increased water use as long as there are proper measures in place to cope with the increase in waste water. For example, with respect to drilling, will additional sumps be created or do the current sumps have enough capacity to deal with the increased waste water? Should additional sumps be needed, are there enough suitable locations available?

- EC recommends that the proponent update the Spill Contingency Plan and the Abandonment and Restoration Plan for the project to reflect the proposed additions and changes to camp facilities.

Comments previously submitted on behalf of EC regarding water license 2BE-GEO would still apply to this project. If there are any additional proposed changes to the project EC should be notified, as further review may be necessary. Please do not hesitate to contact the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca.

Yours truly,



Paula C. Smith
Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT)
Allison Dunn (Sr. Environmental Assessment Coordinator, EPO, Iqaluit, NU)
Ron Bujold (Environmental Assessment Officer, EPO, Yellowknife, NT)