



2BE-GEO2025 Revised Spill Plan

Merle Keefe <mkeefe@sabinagoldsilver.com>

Tue, Jul 14, 2020 at 7:25 AM

To: Richard Dwyer <richard.dwyer@nwb-oen.ca>

Cc: Licensing Department <licensing@nwb-oen.ca>, Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>, Matthew Pickard <mpickard@sabinagoldsilver.com>

Good Morning Richard,

Please find Sabina's responses to the comments provided below:

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KIA Comment #1

The KIA recommends that Sabina preheat freshwater prior to adding salt and re-heat the re-circulate drilling fluid to minimize the amount of salt and fresh water used in drilling operations. Also Calcium Chloride should be the salt used in creating brine drilling fluid.

Sabina Response

- *In the Winter and shoulder seasons of Spring and Fall, the water is preheated at all times. In Summer operations, the water is not heated or reheated with the exception of adding the calcium chloride.*
- *Calcium Chloride is used exclusively.*

KIA Comment #2

Drill casing should be inspected prior to use to ensure that there are no cracks or damage to the casing that would result in brine leakage. There should also be active monitoring of drill casings during drilling to detect any cracking or damage and resultant leakage of drilling fluids.

Sabina Response

- *Drillers, and their fifth man (maintenance crew), are working with and inspecting their equipment (including casing) on a daily basis. All casing is inspected prior to and during usage, and cracked or damaged casing causing leakage would be rectified immediately.*
- *Return volumes from the hole being actively drilled are routinely monitored. These return volumes are the primary method of indicating whether or not drilling fluids are being lost throughout the hole in the deep bedrock. Drillers report the loss of return water immediately and take actions to rectify.*
- *In holes where return is noticeably reduced, drill casing can be reamed into the bedrock in an effort to tighten up any improperly sealed casing.*

KIA Comment #3

Spill pads composed of coco-nut fibre with absorbent materials should also be placed under the drilling platforms to proactively contain any drilling fluid leakage that may occur.

Sabina Response

- *Active drills at Back River maintain a level of secondary containment which is not limited to the installation of coco matting. Best management practices include the installation of tarps underneath the rigs, coco matting, spill pads, drip trays, as well as a catchment basin for drips and return water directly where the bit enters the ground which houses an active sump pump. Sabina also notes that all fuel and oils at active drill rigs are stored within secondary containment at a minimum.*

If any additional information is required, please let us know.

Thanks,

Merle Keefe, EIT

Manager, Environmental Permitting

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From: Richard Dwyer <richard.dwyer@nwb-oen.ca>

Sent: Monday, June 29, 2020 9:45 AM

To: Merle Keefe <mkeefe@sabinagoldsilver.com>

Cc: Licensing Department <licensing@nwb-oen.ca>; Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>

Subject: 2BE-GEO2025 Revised Spill Plan

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