



NIRB File Nos.: 04RN015, 04RN101, 09RN066  
INAC File Nos.: N2004F0038, N2009F0015, N2010F0017  
KIA File Nos.: KTL304F049, KTL399CO10, KTL399CO27

July 20, 2010

Peter Manojlovic  
Sabina Gold & Silver Corp.  
202 – 930 West 1<sup>st</sup> Street  
North Vancouver, BC

Via email: [pmanojlovic@sabinagoldsilver.com](mailto:pmanojlovic@sabinagoldsilver.com)

**Re: Application Acknowledgement and Comment Request for Sabina's "Bathurst Inlet to Back River Winter Road and Barge Landing" project proposal**

Dear Peter Manojlovic:

On July 6, 2010 the Nunavut Impact Review Board (NIRB or Board) received an application from Indian and Northern Affairs Canada (INAC) for a new Land Use Permit for Sabina Gold & Silver Corp.'s (Sabina) "Bathurst Inlet to Back River Winter Road and Barge Landing" project. As elements of this proposal have previously been screened by the NIRB under separate files, a detailed file history and scope of each of the original files has been provided in [Appendix A](#).

#### **Current Application**

Sabina is currently proposing to move supplies and fuel from Bathurst Inlet to its Goose Lake, George Lake, and Hackett River camps via barge and winter road transport, and is applying for a new LUP with INAC to permit the following additional components and project activities which have not been previously screened by the NIRB:

- Establishment of a temporary camp at Bathurst Inlet;
- Establishment of an ice airstrip at Bathurst Inlet; and
- Storage of fuel at Bathurst Inlet including:
  - Drummed fuel (approximately 410,000 litres diesel, 61,500 litres gasoline, 410,000 litres aviation fuel, 7500 pounds of propane and 100 pounds of acetelyne) to be stored within secondary containment at the Bathurst Inlet lay down area
  - Bulk fuel (approximately 600,000 litres diesel) to be stored on barge prior to being transferred to tanks or sleighs for transport to Hackett River/Goose Lake camps via Cat-train (involves overwinter storage via barge freeze-in)

The NIRB has determined that the current request may result in a change to the original scope of the project as previously screened.

The INAC application and the original NIRB screening file, **09RN066** are available from the NIRB's ftp site at the following link:

[ftp://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/2010\\_SCREENINGS/09RN066-Sabina%20Silver%20Corp-Winter%20Roads/1-SCREENING/](ftp://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/2010_SCREENINGS/09RN066-Sabina%20Silver%20Corp-Winter%20Roads/1-SCREENING/).

**Current Request for Comments**

Please note that Section 12.4.3 of the NLCA states that:

*“Any application for a component or activity of a project proposal that has been permitted to proceed in accordance with these provisions shall be exempt from the requirement for screening by NIRB unless:*

*(a) such component or activity was not part of the original project proposal; or*

*(b) its inclusion would significantly modify the project.”*

Should the NIRB determine that the request for a new LUP is not likely to *significantly* change the general scope of the original project activities, the Board will re-issue the terms and conditions contained within the enclosed Screening Decision Reports for NIRB files 04RN015, 04RN101 and 09RN066, along with any new terms and conditions the NIRB considers appropriate. The NIRB is copying Parties and municipalities potentially affected by this proposal and we invite interested persons to comment directly to the NIRB by **August 11, 2010**.

The NIRB would like Parties to provide comments regarding:

- whether the proposed component or activity was a part of the original proposal;
- whether its inclusion would significantly modify the project;
- any additional mitigation measures that are appropriate; and
- any other matter of importance to the Party related to the project proposal.

Please send your comments directly to the NIRB at [info@nirb.ca](mailto:info@nirb.ca) or via fax to **(867) 983-2594**.

If you have any questions or concerns, please do not hesitate to contact me at [ahanson@nirb.ca](mailto:ahanson@nirb.ca) or by telephone at 867-983-4615.

Sincerely,



Amanda Hanson  
Technical Advisor  
Nunavut Impact Review Board

cc: Distribution List

Elizabeth Sherlock, Sabina Gold & Silver Corp.  
Spencer Dewar, Indian and Northern Affairs Canada  
Stanley Anablak, Kitikmeot Inuit Association  
Phyllis Beaulieu, Nunavut Water Board

Appendices: Appendix A – Related File History

Enclosed (3): NIRB Comment Form (English)  
NIRB Comment Form (Inuinnaqtun)  
NIRB Screening Decision Reports, File Nos.: 04RN015 (April 7, 2004); 04RN101 (September 17, 2004); 09RN066 (November 30, 2009; February 11, 2010 - *amendment*)

## APPENDIX A – RELATED FILE HISTORY

### **File History: NIRB 04RN015**

The NIRB received a proposal for a winter road corridor between George Lake camp and Goose Lake camp (NIRB File No. 04RN015) from the Kitikmeot Inuit Association on February 25, 2004 (NIRB Screening Decision Report issued pursuant to NLCA Section 12.4.4(a) on April 7, 2004). Project components and activities within the proposal included the following:

- Establishment of an 85.5 kilometre long winter road between George Lake and Goose Lake in the Back River area; and
- Transportation of equipment and supplies to and from the previously established and separately permitted George Lake and Goose Lake camps.

All materials associated with the original NIRB screening file **04RN015** are available from the NIRB's ftp site at the following link:

[http://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/ARCHIVE/2004\\_SCREENINGS/04RN015-Miramar%20Bathurst%20Resources%20Ltd.,%20Winter%20Road/1-SCREENING/](http://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/ARCHIVE/2004_SCREENINGS/04RN015-Miramar%20Bathurst%20Resources%20Ltd.,%20Winter%20Road/1-SCREENING/)

### **File History: NIRB 04RN101**

The original proposal for the winter road from Bathurst Inlet to the Back River area (NIRB File No.: 04RN101) was received by the NIRB from INAC on July 23, 2004 (NIRB Screening Decision Report issued pursuant to NLCA Section 12.4.4(a) on September 20, 2004). Project components and activities included the following:

- Shipment of fuel (approx. 600,000 litres) and supplies from southern port locations to a barge offloading area at Bathurst Inlet during summer months;
- Establishment of a barge landing site at Bathurst Inlet to include:
  - Lay down area for supplies
  - 700,000 litre tank farm (10 EnviroTanks) (*later withdrawn from proposal*)
  - Equipment storage building
  - Temporary camp accommodations for 18 personnel (*later withdrawn from proposal*)
- Fuel barge to overwinter at Bathurst Inlet (i.e. barge to be frozen-in at Bathurst Inlet);
- Establishment of a winter road from Bathurst Inlet to George Lake camp and Goose Lake camp in the Back River project area;
- Movement of fuel (2 travel tanks of 16,000-20,000 litre capacity), supplies, equipment and other chemical/hazardous materials from Bathurst Inlet barge site to George Lake camp and Goose Lake camp via bulldozer, loader, and challenger pulling sleds along winter road routes; and
- Establishment of second 18 person temporary camp at junction of winter road from Bathurst Inlet and the road between George Lake and Goose Lake camps.

All materials associated with the original NIRB screening file **04RN101** are available from the NIRB's ftp site at the following link:

[http://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/ARCHIVE/2004\\_SCREENINGS/04RN101-Miramar%20Bathurst%20Resources%20Ltd.,%20Winter%20Road/](http://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/ARCHIVE/2004_SCREENINGS/04RN101-Miramar%20Bathurst%20Resources%20Ltd.,%20Winter%20Road/)

**File History: NIRB 09RN066**

On October 19, 2009 the NIRB received an application from INAC for Sabina's establishment of winter roads between George Lake and Goose Lake camps and between the George Lake and Hackett River camps ("Winter Roads" project proposal). In recognition of Sabina's 2009 acquisition of the Goose Lake and George Lake properties, and in order to manage related filing and permit applications, the NIRB consolidated the previous NIRB file 04RN015 with the 2009 application for the establishment of winter roads in the Back River area under NIRB file 09RN066 (NIRB Screening Decision Reports issued pursuant to NLCA Section 12.4.4(a) on November 30, 2009 and on February 11, 2010). Project components and activities within the proposal included the following:

- Construction of winter road route between the George Lake and Goose Lake camps (per file 04RN015);
- Construction of winter road route between the George Lake and Hackett River camps (approximately 60 kilometres in length);
- Redistribution of inventory via Cat-haul transportation between the George Lake, Goose Lake, and Hackett River camps; and
- Abandonment and restoration of road routes upon completion of transportation activities.
- Construction and operation of an ice airstrip at D'Arcy Lake to support the use of a Hercules aircraft for up to sixty days;
- Construction and use of a winter road route between the D'Arcy Lake airstrip and the winter road between Hackett River and George Lake camps (approximately 2 kilometres in length).

All materials associated with the original NIRB screening file **09RN066** are available from the NIRB's ftp site at the following link:

[ftp://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/2010\\_SCREENINGS/09RN066-Sabina%20Silver%20Corp-Winter%20Roads/1-SCREENING/](ftp://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/2010_SCREENINGS/09RN066-Sabina%20Silver%20Corp-Winter%20Roads/1-SCREENING/).