



NIRB File Nos. 04RN015, 04RN101, 09RN066  
INAC File Nos.: N2004F0038, N2009F0015, N2010F0017  
KIA File Nos.: KTL304F049, KTL399C010, KTL399C027

August 12, 2010

Peter Manojlovic  
Sabina Gold & Silver Corp.  
2020 – 930 West 1<sup>st</sup> Street  
North Vancouver, BC

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

**Re: Opportunity to address comments received regarding Sabina Gold & Silver Corp.'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. Elements of this proposal have previously been screened by the NIRB under the separate files 04RN015, 04RN101, and 09RN066.

On July 20, 2010 the NIRB issued correspondence to parties and municipalities potentially affected by Sabina's project and invited interested parties to provide comments directly to the NIRB by August 11, 2010.

On or before August 11, 2010 the NIRB had received comments from the following interested parties:

- Government of Nunavut – Culture Language Elders and Youth (GN-CLEY)
- Government of Nunavut – Department of Environment (GN-DOE)
- Environment Canada
- Indian and Northern Affairs Canada

All comments and documents received pertaining to this project proposal can be obtained from the NIRB's ftp site at the following link:  
[http://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/2010\\_SCREENING\\_S/09RN066-Sabina%20Silver%20Corp-Winter%20Roads/1-SCREENING/](http://ftp.nirb.ca/SCREENINGS/COMPLETED%20SCREENINGS/2010_SCREENING_S/09RN066-Sabina%20Silver%20Corp-Winter%20Roads/1-SCREENING/).

A *summary* of the main concerns raised relate to the following:

**GN-CLEY**

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- No objection to the application; records indicate 23 known archaeological sites in the vicinity of the project (as previously identified by Miramar Bathurst Resources Ltd.-employed archaeologists), however none of these known sites interfere with proposed transportation area.

#### GN-DOE

- Concern regarding the potential for project activities to impact caribou, especially migration.
- Concern regarding the timing and methods of winter road usage and closure.
- Potential for low level flights to disturb wildlife in the area.
- Spill planning, including:
  - The proposed fuel barge at Bathurst Inlet satisfies the Environmental Protection Act's *Spill Contingency Planning and Reporting Regulations*' definition of a fuel storage facility. The regulations require that a spill plan be prepared by Sabina for this facility and submitted to the GN-DOE for its approval.
  - Concern that Sabina will be in a position to react to potential spills in a timely, efficient and effective manner.
  - Spill Plan should address the following:
    - Does Sabina have a sufficient stock of spill response equipment to manage a minor or major spill from a barge? Include the list of available spill response equipment (including heavy equipment);
    - Does Sabina have sufficient manpower and expertise at Bathurst Inlet to effect an immediate cleanup operation should this be required? If additional equipment is required above and beyond what Sabina has on site, provide an indication of how long the mobilization and transportation of the needed equipment to Bathurst Inlet may take;
    - Considering the effects that temperature, evaporation, and general shifting of partially floating barges can have on fuel levels, at what point would Sabina be able to detect a leak from a barge? How much fuel would be lost by that point? Precision of this method should be taken into account;
    - Sabina should describe any other methods by which they will monitor the barges for both minor and major leaks.

#### EC

- Recommendations regarding spill contingency planning and response at ice airstrips.
- Comments previously submitted for files 04RN101 and 09RN066 continue to apply to this project.

#### INAC

- Request further and more detailed information regarding storage of fuel associated with ice airstrip(s).

Due to these concerns, the NIRB would like to provide Sabina with an opportunity to address comments received prior to the Board making its decision to the Minister. The NIRB requests that a response be provided directly to our office by **August 26, 2010**.

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

If you have any questions or concerns, feel free to contact me directly at 867-983-4615 or [ahanson@nirb.ca](mailto:ahanson@nirb.ca).

Sincerely,

A handwritten signature in black ink, appearing to read 'Amanda Hanson', with a stylized, cursive script.

Amanda Hanson  
Technical Advisor  
Nunavut Impact Review Board

cc: Distribution List  
Elizabeth Sherlock, Sabina Gold & Silver Corp.  
Spencer Dewar, Indian and Northern Affairs Canada