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EC file: 4703 001 106  
NWB file: 2BE-GOO1015

Richard Dwyer  
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*Via email: [licensingadmin@nunavutwaterboard.org](mailto:licensingadmin@nunavutwaterboard.org)*

**RE: 2BE-GOO1015 Amendment Application License Number Confirmation**

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

Sabina Gold & Silver Corp. (Sabina) is applying to amend Type “B” water license 2BE-GOO1015 for water use and waste disposal associated with activities at their Goose Lake Project Camp. Project activities included in this amendment are: seasonal operation of temporary camps located in the area of lakes identified as being large enough to allow ice airstrip construction, seasonal operation of temporary camps to support early-season resupply activities, construction of temporary camp facilities, construction of an ice airstrip, transport of fuel and drilling supplies to and from the temporary camp and associated airstrip and storage, storage of fuel and chemicals for exploration activities, transport of personnel with helicopter and fixed-wing aircraft, inspection and reclamation of drill sites upon drill hole completion, and camp clean up and progressive reclamation.

Upon review of the supporting documents for this amendment, EC provides the following comments and recommendations for the NWB’s consideration:

- All mitigation measures identified by the proponent, and the additional measures suggested herein, should be strictly adhered to in conducting project activities. This will require awareness on the part of the proponents’ representatives (including contractors) conducting operations in the field. EC recommends that all field operations staff be made aware of the proponents’ commitments to these mitigation measures and provided with appropriate advice/training on how to implement these measures.
- EC suggests that should the proponent use frozen lakes as airstrips, the proponent maintains a spill kit, which is readily available for any spills that may occur on the ice and has a Spill Contingency Plan for the airstrip. The proponent shall not erect camps or store materials other than for immediate use on the surface ice of any water body.
- Refuelling shall not take place below the high water mark of any water body and shall be done in such a manner as to prevent any hydrocarbons from entering any water body frequented by fish.

- A spill kit, including shovels, barrels, absorbents, etc. should be readily available at all locations where fuel is being stored or transferred and should accompany transport vehicles in order to provide immediate response in the event of a spill.

Comments previously submitted on behalf of EC regarding water license 2BE-GOO1015 and 2BE-GOO510 would still apply to this project. If there are any changes in the project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at [Paula.C.Smith@ec.gc.ca](mailto:Paula.C.Smith@ec.gc.ca).

Yours truly,



Paula C. Smith  
Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT)  
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