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

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Via email: licensing@nunavutwaterboard.org

RE: 120412 2BE-GOO1015 Amendment 3 Application

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 is proposing to amend water license 2BE-GOO1015 to reduce the project area of the current water license in order to minimize overlap with adjacent water licenses. The proposed amendment would also clarify and include the water use and waste disposal associated with infrastructure improvements including an all-weather airport, connecting road to Goose camp, rock quarries, increased fuel and supply storage and increased camp size.

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

Spill Contingency Plan

- EC recommends that the Spill Contingency Plan, including maps and locations of spill kits, be updated to reflect the increase in on-site fuel storage.

Road Construction and Quarrying

- In order to lessen the overall footprint of project activities, EC strongly urges the proponent and Boards to look at minimizing the width of transportation corridors used in association with exploration activity. The creation and widening of trails and access roads as well as establishment of camps impact the Arctic and subarctic environment: the vegetative mat may be damaged, soils may be compacted and permafrost may melt, resulting in subsidence and erosion.
- 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. All construction materials; gravel fill, culverts bridge material, and miscellaneous tools as well as debris or sediment should be located a minimum of 30 m from the high water mark of, and such they do not enter, any water body.

- EC recommends that an undisturbed buffer zone of at least 30 m be maintained between any quarrying that may occur and the normal high water mark of any water body and should only take place one metre above the summer or high groundwater table.
- The proponent shall not deposit nor permit the deposit of sediment into any water body and appropriate erosion control measures will be implemented, as required, down gradient of any quarrying activities.
- Stream bank disturbances must be minimized and all disturbed areas stabilized upon completion of the project.
- Equipment which will be working in-stream or fording the stream shall be clean and inspected for leaks prior to entering the stream channel.
- Abutment construction materials shall be clean and contaminant free; rock/construction materials are not to be gathered from below the high water mark of any watercourse.
- All applicable permits must be obtained prior to commencing any in-stream activity.

Comments previously submitted on behalf of EC regarding water license 2BE-GOO would still apply. 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)
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