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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

File No.: **2BE-GOO1520**

May 24, 2018

Matthew Pickard  
Vice President, Environment and Sustainability  
Sabina Gold & Silver Corp.  
#1800 – 555 Burrard Street  
Box 220  
Vancouver, BC V7X 1M9

Email: [mpickard@sabinagoldsilver.com](mailto:mpickard@sabinagoldsilver.com)

**RE: NWB Technical Review of 2017 Annual Report for the Goose Lake Property, Back River Project; Water Licence No. 2BE-GOO1520**

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Dear Mr. Pickard:

The Nunavut Water Board (NWB) has completed a technical review of the 2017 Annual Report along with the additional submission provided with the Annual Report. The Annual Report submission included an updated Comprehensive Spill Contingency Plan.

On April 20, 2018, the NWB acknowledged receipt of the Annual Report and the additional submission and provided them to Kitikmeot distribution list for information. No comments have been received to date.

The technical review of the Annual Report, and the additional submission provided, found that additional information is necessary to meet the following requirements of the Licence:

- Part D, Item 2:

The Licensee shall implement the Plan entitled “Back River Project Comprehensive Waste Management Plan”, revised January 2013, submitted as additional information with the Application and originally accepted by the Board. The Licensee is required to update the Plan annually and submit any changes, in the form of an addendum complete with a record of revision, to the Board for review by March 31st of the year following the update.

The Annual Report did not provide an update to the “Back River Project Comprehensive Waste Management Plan”. While Section 4.0 of the Annual Report does discuss review of management plans as per Part B, Item 2c of the Licence, this does not specifically

address the requirements under Part D, Item 2.

- Part D, Item 3:

The Licensee shall implement the Plan entitled “Comprehensive Hazardous Materials Management Plan”, dated January 2012, submitted as additional information with the Application and originally accepted by the Board. The Licensee is required to update the Plan annually and submit any changes, in the form of an addendum complete with a record of revision, to the Board for review by March 31st of the year following the update.

The Annual Report did not provide an update to the “Comprehensive Hazardous Materials Management Plan”. While Section 4.0 of the Annual Report does discuss review of management plans as per Part B, Item 2c of the Licence, this does not specifically address the requirements under Part D, Item 3.

Please provide this information in the 2018 Annual Report and all future reports. If for some reason data or information is not available, include a discussion indicating:

- What information is missing;
- Why it was not collected; and
- Steps being made to collect it in the future.

Should you have any questions, please feel free to contact me, Dave Baines, at (867) 360-6338 (extension 29), at your earliest convenience.

Sincerely,

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Dave Baines  
Nunavut Water Board,  
Technical Advisor

Cc: Distribution List – Kitikmeot