



Water Resources Division
Nunavut Regional Office
Iqaluit, NU
X0A 0H0

NWB File: 2BE-GOO1015
CIDMS #: 449869

FEB 24, 2011

Re: 2BE-GOO1015 – Request for Open Burning – Goose Lake – Sabina Gold and Silver Corporation.

Please be advised that Indian and Northern Affairs Canada (INAC) have completed a review of the request for open burning for water license 2BE-GOO1015 (Goose Lake) submitted by Sabina Gold and Silver Corp. The NWB circulated the request for open burning for comments on Jan 24, 2011. All documents related to the request posted on the NWB ftp site under 2BE-GOO1015 were included in my review (See attached Technical Review Memo).

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4282 or by email at Ian.Parsons@inac.gc.ca.

Sincerely,

Original signed by

Ian Parsons
Regional Coordinator

Cc. Jim Rogers, Manager of Water Resources – Indian and Northern Affairs
Canada, Nunavut Regional Office



Technical Review Memorandum

To: Phyllis Beaulieu – Manager of Licensing, Nunavut Water Board

From: Ian Parsons – Regional Coordinator, Indian & Northern Affairs Canada.

Re: 2BE-GOO1015 – Request for Open Burning – Goose Lake – Sabina Gold and Silver Corporation.

Background

The Goose Lake project is located in the Kitikmeot Region of Nunavut 160km South of Bathurst Inlet. The Goose Lake Project is part of the much larger Back River Project which includes several other properties. Goose Lake will be the operational base for drilling activities at Boot Lake, Boulder Pond, Wishbone Trend and Del Lake claims. It is also the base of operations for George Lake; however, George Lake has its own Water License. Existing facilities at Goose Lake consists of an emergency gravel airstrip, jetty/floating dock, 4 helipads and other site structures associated with running and maintaining a drilling operation that can accommodate a maximum of 80 people.

Earlier this year Sabina Gold and Silver Corporation applied for an amendment to their license this included, among other things, an amendment to allow for open burning.

Although the amendment was approved, Sabina Gold and Silver was told by the NWB that the amendment item for open burning would not be accepted at this time and that Sabina Gold and Silver Corporation would have to put in a request to open burn under a separate letter.

Recommendations/Comments

First, INAC would like to state that the burning of wood waste as a form of disposal is not encouraged.

INAC would also like to state and recommend that if wood products and supplies can be brought to a remote location, then the proponent (licensee) should be able to remove those same products and supplies the same way they got the products and supplies to the remote location.



INAC therefore recommends either the re-use of products or, if this is not possible, the removal, off site, of all waste products and supplies to an appropriately approved facility rather than burning.

In the event that reuse or removal cannot be accomplished, INAC is not opposed to a limited and effective open burn with the following recommendations:

1. Only wood products that have **not** been treated in any form shall be burned.
2. No treated wood or wood products, plywood or any other material treated or contaminated with petroleum based products should be burned.
3. All non-combustible materials associated with the waste wood (i.e., plastics, tar paper, floor coverings, shingles, insulation, wiring, and tents) shall be thoroughly **removed** prior to the burning of the waste wood
4. The products mentioned in (1) above shall be in a size that is manageable and will ensure that a complete burn of the product(s) will occur.
5. The burn shall remain in a **'hot phase' or 'hot burn'** until complete combustion of the product(s) has taken place and no unburned wood debris is left over. Air assistance to the fire should be considered to improve complete combustion of the waste.
6. After the burn is complete, any ash or other residual debris (i.e nails) found shall be cleaned up and disposed of in an appropriate matter.
7. Little evidence should remain that a fire occurred at the chosen location.

INAC would like to reiterate that open burning is not encouraged and that any and all other methods for the re-use and/or disposal of the wood waste products should be investigated.

Cc. Jim Rogers, Manager of Water Resources – Indian and Northern Affairs Canada, Nunavut Regional Office
Peter Kusugak, District Manager – Indian and Northern Affairs Canada, Nunavut Regional Office