Water Resources Division Nunavut Regional Office Iqaluit, NU X0A 0H0 NWB File # 2BE-HAK0709 CIDMS # 357698

Sept 28, 2009

Richard Dwyer License Administrator P.O. Box 119 Gjoa Haven, NU X0A 0H0

Re: 2BE-HAK0709 – Application to Renew and Amend Water License – Sabina Silver Corp. – Hackett River Project

Please be advised that Indian and Northern Affairs Canada (INAC) have completed a review of 2BE – HAK0709 Type "B" Water License 2009 Application for Renewal and Amendment for the Hackett River Project. The NWB circulated the Report for comments on Sept 25, 2009. All associated documents related to the license renewal and amendment application are posted on the NWB ftp site under 2BE-HAK0709 and were referred to in my review (See attached Technical Review Memorandum).

Should you have any questions or comments, please do not hesitate to contact me at (867) 979-4282 or by email at lan.Parsons@inac.gc.ca.

Sincerely,

Original signed by

lan Parsons Water Resources Technician

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





Technical Review Memorandum

To: Richard Dwyer – License Administrator, NWB.

Peter Kusugak - Field Operations Manager, INAC.

Scott Burgress - Sabina Silver Corp.

Phyllis Beaulieu - Manager of Licensing, Nunavut Water Board

From: Ian Parsons – Water Resources Technician, Indian & Northern Affairs Canada.

Re: 2BE-HAK0709 – Application for Water License Renewal and Amendment 2009 – Sabina Silver Corp. – Hackett River Project

Existing Water License # 2BE-HAK0709

Background

The Sabina Silver Corporation has applied to renew their current water license, issued for mineral exploration purposes. The renewal application also includes an amendment that would allow for an expansion to camp size (from 40 to a maximum of 75) as well as increasing the number of drill rigs from 3 to 5. Given the increases in personnel and drill rigs, the water license renewal application also references daily water use increases from 198.7 cubic meters to 250 cubic meters per day.

The application for Water License Renewal and Amendment submitted by Sabina Silver Corp. (Scott Burgess) for the Hackett River Project # 2BE – HAK0709 contained all required documentation.

Recommendations/Comments

- 1) The application cover letter refers to an increase in daily water use from 198.7 m3/day to 250 m3/day, however in the application under Part 4 Description of Undertaking, the increased volume is stated as 220 cubic metres. The Board should determine the correct amount of water use being applied for by Sabina.
- 2) The Board should impose the same conditions as were applicable to the previous water license # 2BE-HAK0709.
- 3) The Spill Contingency Plan states that the Water Resources Inspector should be contacted at 867 975 4295, fax 867 975 6445. This should be corrected to say Peter Kusugak, INAC Manager of Field Operations should be contacted at the above numbers for any spill.



4) See attached comments sent to the Board on Sept 30, 2009 in regard to deficiencies noted during an INAC review of the 2008 Annual Report. These items should be addressed prior to any license renewal.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4738 or by email at lan.Parsons@inac.gc.ca

Sincerely,

Original signed by

Ian Parsons Water Resources Technician

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

