

Environmental Protection Operations  
Qimugjuk Building 969  
P.O. Box 1870  
Iqaluit, NU X0A 0H0  
Tel: (867) 975-4631  
Fax: (867) 975-4645

14 May 2010

EC file: 4704 004 021  
NWB file: 2BE-HAK0915

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

*Via email: [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)*

**RE: 2BE-HAK0915 Amendment – Sabina Gold and Silver – Kitikmeot Region**

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. 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 their Type “B” water license 2BE-HAK0915 to include temporary 15-person camps proposed to be located at D’Arcy Lake, Aorta Lake, Kuuk Lake, and Pterydactyl Lake area. The locations and use of these temporary camps are dependent on the location of exploration targets and operational needs. Camps will be seasonally occupied between 1 February and 31 October. Associated activities include the construction of the camp facilities, potentially an ice airstrip, and the transport of fuel, personnel, and drilling supplies to and from the temporary camp and associated airstrip and storage facilities. Upon completion of activities, inspection and reclamation activities will occur.

EC provides the following comments and recommendations for the NWB’s consideration:

**Camp**

- 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.
- EC has no issues with using the lake as an airstrip provided 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.
- 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 ATVs and snowmobiles in order to provide immediate response in the event of a spill.

EC has no issues with the amendment provided the proponent follows mitigation measures outlined in the application, address issues listed above, and that they are in compliance with their existing water license. Previous comments and recommendations submitted by C. Spagnuolo on 19 May 2006 and by C. Parker on 23 January 2007 would still apply (see attached).

If there are any changes in the proposed 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)  
Ron Bujold (Environmental Assessment Technician, EPO, Yellowknife, NT)