Richard Dwyer

From: Richard Dwyer [licensingadmin@nunavutwaterboard.org]

Friday, January 21, 2011 4:44 PM Sent:

To: 'Elizabeth Sherlock'

Cc: Sean Joseph; 'NWB Karén Kharatyan'; 'dts@nunavutwaterboard.org'

Subject: 2BE-HAK0915 Attachments: Richard Dwyer.vcf

Hi Elizabeth,

The Nunavut Water Board (NWB) acknowledges receipt of the controlled open burning requests for untreated wood; however, for the 2BE-HAK0915 water licence the NWB notes Part D, Item 4 reads:

The Licensee shall provide to the Board documented authorization from all communities receiving wastes from the Hackett River Project prior to any backhauling of wastes to those communities.

The NWB would like to request clarification on the request for 2BE-HAK0915.

Thanks.

Richard Dwyer Nunavut Water Board Licensing Administrator (867) 360-6338 Work licensingadmin@nunavutwaterboard.org PO Box 119 Gioa Haven NU X0B 130 Canada

From: Elizabeth Sherlock [mailto:ESherlock@sabinagoldsilver.com]

Sent: Friday, January 21, 2011 1:52 PM To: k.kharatyan@nunavutwaterboard.org Cc: Richard Dwyer; Dan Russell; John Laitin

Subject: RE: 2BE-GOO1015 amendment request deficiencies

Good Afternoon,

Please see attached correspondence; if there is anything further please contact me.

Thank you, Elizabeth

Elizabeth Sherlock

Environmental/Permitting Coordinator

Sabina Gold & Silver Corp. 930 West 1st Street, Suite 202 North Vancouver, BC V7P 3N4 Phone (604) 998-4175 Fax (604) 998-1051

ESherlock@SabinaGoldSilver.com

From: Karen Kharatyan [k.kharatyan@nunavutwaterboard.org]

Sent: January 19, 2011 8:03 AM

To: Elizabeth Sherlock **Cc:** Richard Dwyer

Subject: RE: 2BE-GOO1015 amendment request deficiencies

Good morning Elizabeth,

I would like to know if you already have the response to the comments or you are still working on it?

Regards,

Karén Kharatyan, Ph.D

Technical Advisor Nunavut Water Board

(Ph.) 867-360-6338 ext. 30 (Fx.) 867-360-6369

k.kharatyan@nunavutwaterboard.org

From: Elizabeth Sherlock [mailto:ESherlock@sabinagoldsilver.com]

Sent: Tuesday, January 11, 2011 9:33 AM

To: Karen Kharatyan Cc: Richard Dwyer

Subject: RE: 2BEGOO1015 amendment request deficiencies

Thank you Karen for forwarding the INAC response; I was able to check the others that have been posted on the NWB webpage. We are looking at the comments raised by INAC and hope to have a response by the end of the week. I hope this will accommodate the technical review.

Elizabeth

Elizabeth Sherlock

Environmental/Permitting Coordinator **Sabina Gold & Silver Corp.** 930 West 1st Street, Suite 202 North Vancouver, BC V7P 3N4 Phone (604) 998-4175

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ESherlock@SabinaGoldSilver.com

From: Karen Kharatyan [k.kharatyan@nunavutwaterboard.org]

Sent: January 11, 2011 8:14 AM

To: Elizabeth Sherlock **Cc:** Richard Dwyer

Subject: RE: 2BEGOO1015 amendment request deficiencies

Hi Elizabeth,

We just got the comments from different parties for your amendment application. Especially, INAC noted that the second part of question 6 of the application was not answered. I acknowledge that there is a submitted appendix related to this question, however, the application would be more complete with the answered question. I am forwarding to you the comments from INAC. I will appreciate, if you clarify these questions.

The comments from the other parties are mostly incorporated in the licence conditions. So no need to further clarification.

The application is in final technical review process and shall be finalized once you respond to the INAC comments.

Best regards,

Karén Kharatyan, Ph.D Technical Advisor Nunavut Water Board

(Ph.) 867-360-6338 ext. 30 (Fx.) 867-360-6369 k.kharatyan@nunavutwaterboard.org

From: Elizabeth Sherlock [mailto:ESherlock@sabinagoldsilver.com]

Sent: Friday, December 10, 2010 11:33 AM **To:** k.kharatyan@nunavutwaterboard.org

Subject: RE: 2BEGOO1015 amendment request deficiencies

Thank you for clarifying the process and request needs. It will help planning for the upcoming season and submitting the request at the appropriate time.

Elizabeth

From: Karen Kharatyan [k.kharatyan@nunavutwaterboard.org]

Sent: December 10, 2010 9:11 AM

To: Elizabeth Sherlock

Subject: RE: 2BEGOO1015 amendment request deficiencies

Hi Elizabeth,

You don't need to prepare an application for open burning request as a letter is usually sufficient. No separate form to be filled out is needed and no application fees either. The open burning request goes out for 30 days review so a translation letter is necessary.

My understanding is that you are planning to do open burning this summer. As I said already, the NWB is currently in consultations for the open burning procedure. The issue may be addressed before summer. I believe you don't need to submit the request now because the procedure may be changed before summer. The request submitted a couple of months before may be sufficient.

Regards,

Karén Kharatyan, Ph.D Technical Advisor Nunavut Water Board

(Ph.) 867-360-6338 ext. 30 (Fx.) 867-360-6369 k.kharatyan@nunavutwaterboard.org

From: Elizabeth Sherlock [mailto:ESherlock@sabinagoldsilver.com]

Sent: Thursday, December 09, 2010 9:18 AM **To:** k.kharatyan@nunavutwaterboard.org

Subject: RE: 2BEGOO1015 amendment request deficiencies

Thanks for the comments and my apologies for not responding sooner; I've been in courses the past few days. We will prepare a separate request for the Goose open burning. Is a letter OK or is there a separate form that needs to be filled out? Do we need to send the \$30 application fees? what needs to be translated? and I'm curious about the process and timing - does the request go out for the usual 30 day review or is it something else?

Just curious since we are planning to submit a request to open burn at the George camp as well to support reclamation work we need to do this summer and I would like to include whatever is needed as a complete package. Any advise would be appreciated.

Elizabeth

Elizabeth Sherlock

Environmental/Permitting Coordinator **Sabina Gold & Silver Corp.**930 West 1st Street, Suite 202
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Phone (604) 998-4175
Fax (604) 998-1051
ESherlock@SabinaGoldSilver.com

From: Karen Kharatyan [k.kharatyan@nunavutwaterboard.org]

Sent: December 6, 2010 3:51 PM

To: Elizabeth Sherlock

Subject: RE: 2BEGOO1015 amendment request deficiencies

Elizabeth,

I hope that it is clear for you that you don't have to apply for an amendment of the licence for open burning. You shall send a request for Board approval just in case when you need open burning.

The Licensees shall be informed about open burning when a decision is made about the applicability of this condition in the licence.

Regards,

Karén Kharatyan, PhD Technical Advisor Nunavut Water Board

(Ph.) 867-360-6338 ext. 30 (Fx.) 867-360-6369 k.kharatyan@nunavutwaterboard.org

From: Elizabeth Sherlock [mailto:ESherlock@sabinagoldsilver.com]

Sent: Monday, December 06, 2010 3:54 PM

To: 'NWB Karén Kharatyan'

Cc: info@nirb.ca; 'NPC Brian Aglukark'; John Laitin; Richard Dwyer

Subject: 2BEGOO1015 amendment request deficiencies

Mr. Laitin has asked that I respond to your letter of December 1, 2010 outlining the deficiencies of the water license amendment request. Sabina has been working toward addressing these deficiencies in a timely manner and we provide the following;

- A. The requested increase for domestic water use at Goose camp is from 15 m³/day to 30 m³/day. Our apologies for the typographical error.
- B. The request to amend the water license to include terms regarding open burning is because the current terms (Part D) only include the use of incinerator or what cannot be included in an open burn. Specifically:

PART D: CONDITIONS APPLYING TO WASTE DISPOSAL

3. The Licensee is authorized to dispose of all acceptable food waste, paper waste and untreated wood products in an incinerator.

4. The Licensee shall not open burn plastics, wood treated with preservatives, electric wire, Styrofoam, asbestos or painted wood to prevent the deposition of waste materials of incomplete combustion and/or leachate from contaminated ash residual, from impacting any surrounding waters, unless otherwise approved by the Board in writing.

There is no reference to what we can include in an open burn situation with the NWB approval. We are seeking the inclusion of controlled, without the use of incinerator, burning in our options for waste management as there are times over the season when the volume of waste wood products are of a volume, or size, that exceed the design/operation guidelines of our current incinerator. We are requesting an amendment to the water license to include a term (possibly as part of Part D, item 4);

The Licensee shall follow the practices for open burning of selected materials as outlined in the "Waste Management Plan".

A revised Waste Management Plan has been submitted as part of the application package.

Your letter suggests that the NWB will not include this consideration with this amendment request. In this case, a separate request will be submitted for your consideration. We would ask for further details on the needs and the associated approval process if a separate request is required.

- C. The NIRB has been provided a copy of the amendment request package and we will continue to work with them to obtain the screening decision (or confirmation not needed) in a timely manner.
- D. The NPC has been provided a copy of the amendment request package and we will continue to work with them to obtain the conformity decision (or confirmation not needed) in a timely manner.

We look forward to the direction that will come with the development of guidelines for open burning and if we can be of assistance in their development, please contact me. As these deficiencies are addressed, we will submit them to your attention.

Regards, Elizabeth

Elizabeth Sherlock
Environmental/Permitting Coordinator
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