



July 7, 2022

Richard Dwyer
Manager of Licensing
Nunavut Water Board
PO Box 119
Gjoa Haven, NU
X0B 1J0

Re: Application for Renewal of Water Licence 2BE-MLL1722

Dear Richard,

Sabina Gold & Silver Corp. (Sabina) would like to request a renewal and extension to water license 2BE-MLL1722 (the Licence) for the Wishbone-Malley Project. Sabina is requesting a renewal of the license for a further 5 years from June 30, 2022 to June 30, 2027 to allow continued exploration in this area. This is an application for renewal without modification; no modifications or amendments to 2BE-MLL1722 have been identified as necessary.

Wishbone-Malley is an exploration area which has no currently erected infrastructure, although the Licence permits the construction of seasonal or temporary camps to support exploration activities. As in previous years, Sabina intends to continue to make use of existing Back River Project facilities, when possible, to support regional exploration and minimize exploration activity footprint. This includes utilizing existing camps and waste management infrastructure at Goose, George or the MLA for Wishbone-Malley exploration to the extent practical. Activities at these sites will adhere to all authorizations and approved management plans applicable to those camps and facilities.

As referenced in the Licence, there is also some overlap between the extents of this Licence and 2BE-GEO2025 and 2BE-GOO2028, which are both components of Sabina's wider Back River Project undertakings. Sabina will continue to treat exploration activities that overlap with either of these licences as if they were solely under the project extents of 2BE-GEO2025 or 2BE-GOO2028 (as applicable).

Application Form

A completed Nunavut Water Board (NWB) renewal application form is included as Attachment 1. A map showing the Project location is included as Attachment 2.

Scope of Activities Proposed Under the Water Licence Renewal

This renewal does not represent a change in scope for the Project. Activities and water use will be consistent with current authorizations.

Previous Land Use Planning Conformity and NIRB Screenings

As per the requirements of the Nunavut Planning and Project Assessment Act, this application has been submitted to the Nunavut Planning Commission (NPC) for a determination of whether a land use plan conformity review and a screening by Nunavut Impact Review Board (NIRB) is required. This Project was last reviewed by the NPC during the 2017 renewal of this Licence. An NPC determination concluding that the Project was outside the area of an applicable land use plan and that it was exempt from screening by the NIRB was issued on March 22, 2017 (Attachment 3; NPC File # 148494).

The first Type B Water Licence for the Wishbone-Malley Project was issued in 2012. The Licence was renewed without amendment in 2017. This Project was initially screened by the NIRB in 2006 (see May 15, 2006 NIRB Screening Decision Report – Bolder Property – File No. 06EN033 (Attachment 4). A consolidated screening of all Dundee Precious Metals Inc.'s holdings in the Beechy Lake area (inclusive of the Back River and Wishbone claim areas) was completed in 2008 under NIRB file 08EA084 and a screening decision report issued by the NIRB on March 3, 2009 (Attachment 5).

Sabina notes that the Wishbone-Malley Project still lies outside of a planning region with an approved regional land use plan and, being a renewal application without change, it is anticipated that neither an NPC conformity review or a NIRB screening will be required, as was determined to be the case when last renewed.

Updated Plans

Sabina's environmental management plans for the Wishbone-Malley Project and exploration project and Water Licence have been reviewed and updated, and revisions are provided with this application as Attachments 6, 7, and 8:

Date	Plan
2022 May	Back River Project Exploration Spill Contingency Plan
2022 June	Exploration Non-Hazardous Waste Management Plan
2022 May	Back River Project Abandonment and Restoration Plan, Wishbone – Malley

Updated Security Assessment

A letter of credit is held by the Kitikmeot Inuit Association (KIA) for this Project under KTL312C004. Sabina is providing an Abandonment and Restoration Plan with this application (Attachment 8) which describes a theoretical camp and appropriate abandonment and restoration measures. It is noted that no infrastructure is currently located within the Wishbone-Malley project area.

Updated Financial Statement

Sabina's most recent financial statements can be found on its website at <http://www.sabinagoldsilver.com/investors/financial-reports>. 2022 first quarter interim financial results indicated that the company had cash and cash equivalents \$181 million at March 31, 2022. More information is available at: <http://www.sabinagoldsilver.com/assets/docs/fs/2022-Q1-FS.pdf>

Compliance Assessment / Status Reports

Water Resources Inspector inspection reports can be found on the NWB public registry. There are no outstanding compliance or Water Resources Inspector concerns related to this Licence.

English, Inuinnaqtun and Inuktitut Summaries of Renewal Application

Plain language summaries of the activities contemplated under the renewal are included as Attachment 9.

Application Fee and Water Use Deposit

The renewal application form requires submission of a \$30 application fee plus a water use fee deposit of \$30. A cheque addressed to the Receiver General for Canada is being forwarded to the Nunavut Water Board office in Gjoa Haven.

Should you have any questions or concerns or require additional information, please do not hesitate to contact me.

Regards,

Merle Keefe
Manager, Environmental Permitting
Sabina Gold & Silver Corp.
#1800 – 555 Burrard Street
Vancouver, BC
V7X 1M9

Enclosed:

Attachment 1 – Application Form
Attachment 2 – Project Map
Attachment 3 – March 22, 2017 NPC Conformity Determination File 148494
Attachment 4 – May 15, 2006 NIRB Screening Decision Report File No. 06EN033
Attachment 5 – March 3, 2009 NIRB Screening Decision Report File No. 08EA084
Attachment 6 – Exploration Spill Contingency Plan
Attachment 7 – Exploration Waste Management Plan
Attachment 8 – Abandonment and Restoration Plan
Attachment 9 – Plain Language Summaries
Attachment 10 – Certificate of Amendment of Registration