



Indigenous and  
Northern Affairs Canada

Affaires autochtones  
et du Nord Canada

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

NWB File: 2BE-MLL1217  
CIDMS #: 1144875

April 26, 2017

**Re: 2BE-MLL1217– Water License Renewal Application – Malley - Wishbone – Sabina Gold and Silver Corporation (Sabina).**

Please be advised that Indigenous and Northern Affairs Canada (INAC) have completed a review of the water license renewal application for water license 2BE-MLL1217 (Malley-Wishbone) submitted by Sabina Gold and Silver Corp. The Nunavut Water Board (NWB) circulated the water license renewal application for comments on March 25, 2017. All documents related to the request posted on the NWB ftp site under 2BE-MLL1217 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@aandc-aadnc.gc.ca](mailto:Ian.Parsons@aandc-aadnc.gc.ca).

Sincerely,

*Original signed by*

Ian Parsons  
Regional Coordinator



## **Technical Review Memorandum**

To: Karen Kharatyan – Manager of Licensing, NWB

From: Ian Parsons – Regional Coordinator, AANDC.

---

**Re: 2BE-MLL1217– Water License Renewal Application – Malley -  
Wishbone – Sabina Gold and Silver Corporation (Sabina).**

### **Background**

The proposed Malley-Wishbone exploration project would be located in the Kitikmeot Region of Nunavut 100km South of Bathurst Inlet. This water license is a part of the much larger Back River Project which includes several other properties, including George Lake and Goose Lake. Sabina proposes that the operation of this property will be mostly based out of the Goose Camp with Sabina possibly erecting satellite camps at strategic locations for safety. These camps may include infrastructure such as a kitchen, pack sheds, offices, driller's dry, coreshacks and canvas tents for sleeping quarters, as well as two helicopter pads. These facilities will enable the proponent to carry out its drilling program.

INAC recommends that the proponent notify the NWB of all main, temporary and seasonal camp locations as well as all source water locations and helicopter pad locations before any construction of these facilities take place.

### **Spill Contingency Plan**

Although the spill contingency plan contains all pertinent information for the safe handling of different types of spills on different substrates INAC recommends that the proponent submit a revised site specific spill plan that contains all relevant information to water license application 2BE-MLL1217. Any other information contained in the spill plan not relevant to the water license should be omitted from the spill plan.

The Spill Contingency Plan should be revised to include the INAC Manager of Field Operations as the primary INAC contact for reporting hazardous material spills. The manager can be reached by telephone at (867) 975-4295 or fax at (867) 975-6445.



INAC would like to remind the proponent that they must follow the Government of Nunavut's *Spill Contingency Planning and Reporting Regulations*.

INAC also recommends the use of drip pans and/or other secondary containment device when refuelling or transferring fuel operations are to take place.

### **Abandonment and Restoration (A&R) Plan**

INAC recommends that the A&R plan be revised to a site specific plan covering all camp infrastructure and areas where the land will be disturbed by operations and activities conducted under water license 2BE-MLL1217. Any information contained in the A&R plan not relevant to operations applied for under water license 2BE-MLL1217 should be omitted

### **Waste Management Plan**

INAC recommends that the Waste Management plan be revised to a site specific plan containing only information relevant to camp operations applied for under water license 2BE-MLL1217. Any information contained in the Waste Management plan not relevant to operations applied for under water license 2BE-MLL1217 should be omitted.