

ATTACHMENT 8 - ABANDONMENT AND RESTORATION PLAN



Back River Project

Abandonment and Restoration Plan

Wishbone-Malley

MAY 2022

Table of Contents

1.0 INTRODUCTION	4
1.1 General	4
1.2 Sabina Sustainable Development Policy	4
1.3 Legal Requirement.....	5
1.4 Site Location and Description	5
1.5 Scope	6
2.0 RESPONSIBILITIES	6
3.0 SCHEDULE	6
3.1 Potential Future Infrastructure at the Wishbone-Malley Exploration Area	6
3.2 Progressive Reclamation.....	7
3.2.1 Contaminated Areas.....	7
3.2.2 Non-combustible Solid Waste	8
3.2.1 Drilling	8
4.0 SEASONAL CLOSURE	8
4.1 Buildings and Contents	8
4.2 Water Supply System.....	9
4.3 Sewage System	9
4.4 Electrical System	9
4.5 Camp Heating Systems	9
4.6 Petroleum Products and Storage Facilities.....	9
4.7 Chemicals	10
4.8 Spill Response Kits	10
4.9 Transportation.....	10
4.10 Drill Sites	10
4.11 General Camp Area	11
4.12 Final Documentation.....	11
5.0 PERMANENT CLOSURE	11
5.1 Administration.....	11
5.1.1 Building Structures	11
5.1.2 Office and Household Furniture	11

5.1.3	Water Supply System.....	11
5.1.4	Sewage System	11
5.1.5	Electrical System.....	12
5.1.6	Camp Heating Systems	12
5.1.7	Petroleum Products and Storage Facilities	12
5.1.9	Household Chemicals	13
5.1.10	Transportation.....	13
5.2	Exploration	13
5.3	Environmental	14
5.3.1	Long-term Monitoring	14
5.3.2	Documentation and Final Inspection.....	14
5.3.3	Land Relinquishment.....	14
5.4	Abandonment & Restoration Cost Estimates	14
6.0	REVIEW OF THE ABANDONMENT AND RESTORATION PLAN	15
APPENDIX A – FIGURES OF BACK RIVER PROPERTY INCLUDING WISHBONE–MALLEY EXPLORATION AREA		16

1.0 INTRODUCTION

1.1 General

Sabina Gold & Silver Corp. (Sabina) is actively exploring the Back River property mineral rights, encompassing the Goose Lake mining and exploration area, the Marine Laydown Area (MLA) at Bathurst Inlet, exploration camp at George Lake and unoccupied claim groups including the Wishbone-Malley Project area, which is the focus of this Abandonment and Restoration Plan (ARP; Plan).

Annual exploration activities at the Wishbone-Malley exploration area typically start in February or March, and end by October. Crew, equipment, and supplies are transported to the Goose Lake or the George Lake exploration camp by air from Yellowknife or by sea from the MLA. From there crews can be deployed to Wishbone-Malley Exploration Area and other claim groups. Aircraft from Yellowknife can utilize the all-weather or ice airstrips at Goose, the MLA, or George. Typically, equipment, personnel, and supplies are moved to the Wishbone-Malley area by helicopter or winter trail. Drill equipment and supplies may remain in remote exploration areas for use during subsequent exploration seasons.

There is currently no infrastructure or equipment at the Wishbone-Malley exploration area. Exploration drilling has taken place in this area in the past and may again be undertaken seasonally in future. Routinely, all drill sites are remediated as they are completed and all equipment and materials are removed from site annually.

As there is currently no infrastructure or equipment located at Wishbone-Malley, this Plan has been based on potential infrastructure which may be erected to support future exploration activities. This Plan would only be implemented if Sabina develops such infrastructure at the Wishbone-Malley exploration area.

1.2 Sabina Sustainable Development Policy

Sabina Gold & Silver Corp. regards itself as a responsible explorer and mineral developer. We are committed to fostering sustainable development throughout all stages of our activities. We constantly strive to conduct our operations in a manner that balances the social, economic, cultural and environmental needs of the communities in which we operate.

To build on this commitment, Sabina will:

- Meet or strive to exceed all relevant legislated sustainable development requirements in the regions where we work.
- Ensure appropriate personnel, resources and training is made available to implement our sustainable development objectives.
- Establish clear lines of responsibility and accountability throughout the company to meet these objectives.
- Implement proven management systems and procedures to facilitate our sustainable development objectives. A Priority will be placed on developing and implementing

management structures related to the environment, health and safety, emergency response and stakeholder engagement.

- Act as responsible stewards of the environment for both current and future generations. We will make use of appropriate assessment methodologies, technologies and controls to minimize environmental risks throughout all stages of mineral development.
- Work closely with local communities and project stakeholders to understand their needs, address their concerns and provide project-related benefits to create win-win relationships. Our goal is to earn and maintain a social licence to operate at all our operations while building partnerships.
- Pursue economically feasible projects in order to generate shareholder profitability and support long-term positive socio-economic development in the regions where we work.
- Utilize a precautionary approach as it applies to potential effects from our activities. Work with employees, contractors and stakeholders to promote a culture of open and meaningful dialogue to ensure that any known or suspected departures from established protocols are reported to management in a timely manner.
- Regularly review this policy to ensure it is consistent with Sabina's current activities and the most recent legislation.
- Continually improve our performance and contributions to sustainable development including pollution prevention, waste minimization and resource consumption.
- Implement programs at each of our operations to monitor and report compliance and proactively address potential deficiencies in our policies and procedures.

The objectives of our Sustainable Development Policy cannot be accomplished without the active involvement and commitment of many dedicated individuals. As such, we will regularly communicate this policy and its outcomes to our employees, contractors and relevant stakeholders. Together, we can foster a culture of sustainable development at Sabina.

1.3 Legal Requirement

Sabina is obligated to reclaim the Wishbone-Malley area within the applicable Kitikmeot Inuit Association (KIA) Land Use Licenses and the Nunavut Water Board (NWB) Water Use Licenses.

1.4 Site Location and Description

The Back River Project is located in the Kitikmeot, south of Bathurst Inlet within the Slave Structural Province. It is approximately 525 kilometres northeast of Yellowknife and 400 kilometres south of Cambridge Bay, NU. The Project area is within the zone of contiguous permafrost, and is represented on National Topographic System 1:250,000 scale map sheets 76F, 76G, 76J, and 76K.

The Project's primary base of operations is at Goose camp located near Goose Lake (Figure 1), supported by a satellite camp near George Lake and at the MLA (Figure 1). These permanent Back River Project camps are used to support wishbone-Malley area activities for resupply, staging, drill support, waste management, and emergencies.

The Wishbone-Malley Exploration Area (Figure 1) grid extents are listed below:

NW: 66°00' North, 109°00' West
NE: 66°00' North, 106°45' West
SE: 66°45' North, 106°45' West
SW: 66°45' North, 109°00' West

As previously mentioned, the Wishbone-Malley exploration area currently has no infrastructure or equipment, although during exploration activities equipment and temporary infrastructure may be established in this area.

1.5 Scope

This Abandonment and Restoration Plan (Plan) outlined the abandonment and reclamation procedures to be undertaken for a potential future Wishbone-Malley camp and on-going exploration activities. This plan provides the base strategy for anticipated tasks of restoring the area in an event where exploration activity has ceased, either on a short term or a long term basis. This plan is reviewed periodically based on site activities and updated as necessary.

2.0 RESPONSIBILITIES

Senior personnel at the Back River Project and future Wishbone-Malley camp management are responsible for the implementation of this plan. Additionally, every employee, contractor, and visitor arriving on the Back River Project site has a responsibility to ensure that they adhere to Sabina policies include those aimed at minimizing environmental impact.

3.0 SCHEDULE

Should the infrastructure described below have been constructed, closure would take 14-21 days to complete, allowing for variable weather conditions. As exploration activities vary from year to year and the end of the field season is difficult to predict months in advance, any restoration programs will likely commence in the late summer and extend into the 4th quarter of the year. Wishbone-Malley closure activities would be supported by the existing permanent Back River Project camps.

3.1 Potential Future Infrastructure at the Wishbone-Malley Exploration Area

It is again noted that there is currently no infrastructure at the Wishbone-Malley exploration area. The below list details potential future infrastructure that Sabina could consider constructing. Before construction of any infrastructure at the Wishbone-Malley Exploration Area that will not be removed seasonally, Sabina will ensure the financial assurance for the project currently held with the Kitikmeot Inuit Association is suitable to complete the restoration.

The future Wishbone-Malley camp would be located adjacent to a lake and would be a 60-person camp

used primarily to support exploration activities across the Malley and Wishbone properties. The general camp facilities may include:

- 15 sleeper tents (20' x 20' weather havens);
- 1 kitchen/dining facility;
- 2 dries/ablution;
- 2 office tents;
- 1 storage tent/shed;
- 1 mechanic shed;
- Core cutting/core logging facilities;
- Generator;
- Fuel storage areas (up to 500,000L drummed fuel within secondary containment);
- Laydown area;
- 2 helipads;
- Ice strip;
- Terrain airstrip (if the existing terrain in the camp area is conducive to such use, the area would be reconditioned to meet operational needs);
- Communication towers and repeater stations as needed; and
- Equipment such as loaders, skidsteers, bulldozers, ATVs, snowmachines.

When in operation, the camp would be serviced with a Pacto toilet system. Greywater will be contained within sumps located a minimum of 31 m away from the high watermark of any waterbody. Wastes would be sorted and transported to one of the permanent Back River Project camps to be managed as outlined in their approved waste management plans. Any kitchen waste would be securely stored (e.g. in a sea container) until transported off site for incineration.

Potable water may be obtained from the local lake with the freshwater intake screened to reduce fish uptake; bottled water may be used as an alternative source.

3.2 Progressive Reclamation

Sabina has embarked on a program of progressive reclamation over the entire Back River Project area. Progressive reclamation will be ongoing throughout any exploration programs thereby reducing the need for a full-scale restoration program at the closure of each exploration phase. While no infrastructure currently exists at the Wishbone-Malley Exploration Area, should any facilities be developed, the possible ongoing significant restoration activities as described below would apply.

3.2.1 Contaminated Areas

3.2.1.1 Recycle of Water Contaminated Fuel

Contaminated fuels are recycled primarily as fuel for the water heaters used in the drilling program, or as fuel for Back River Project incinerators. If present in sufficient quantities, contaminated fuel may be recycled for camp heating purposes. For water with minor amounts of hydrocarbons, an oil-water separator may be used and/or activated charcoal filters. As a last resort, water contaminated fuel may be transported off the property for disposal at an appropriate facility.

3.2.1.2 Contaminated Top Soil

Spills are handled as per the Comprehensive Spill Contingency Plan. Enviromat (or similar) is immediately applied to absorb spills of hydrocarbons, minimizing the amount of soil required to be removed. Remaining contaminated soils are removed and stored in barrels for transportation to permitted disposal off site.

3.2.2 Non-combustible Solid Waste

Solid waste including metal scraps, drill rods, household items, etc. are stored in an appropriate marshalling area for backhaul. The material is arranged in such a way that it can be easily removed from the exploration area, and disposal will be appropriate to the material being removed, either to an approved disposal facility, metal recycler, or an approved designated landfill.

3.2.1 Drilling

Following completion of each drill hole all equipment, materials and wastes are removed from the site. Diamond drill site restoration is undertaken as soon as practical after completion of the hole and includes site clean-up of litter, debris, and drill fluids. Drill core and core boxes will be properly secured and stored at the designated core storage area.

Casings protruding above ground are cut off to a level that will not pose a hazard and capped. The cut portion will be disposed of off site; this will either be in an approved landfill or recycled as scrap metal. Drill holes which encounter artesian water flow will be plugged with cement and capped. The collar locations of all holes will be surveyed in and will be recorded in the exploration reports.

All drill sumps (if constructed) will be recontoured and allowed to naturally revegetate. Natural sumps (if used) will simply be allowed to revegetate.

Photos are taken prior to and after the drill work is completed and an inspection sheet is in place for the geologist to verify the site was left in good condition.

4.0 SEASONAL CLOSURE

This plan is intended to cover short-term (seasonal) closures of any active areas at the Back River Project. The tasks involved are important to the success of future exploration programs but require significantly less effort than the full restoration plan. Currently no infrastructure exists at the Wishbone-Malley Exploration Area. Should any infrastructure be constructed in the future, these components would be seasonally closed as described below.

4.1 Buildings and Contents

All tents and building complexes will be secured for the winter. All the office equipment, household furniture, kitchen equipment, recreational equipment, and other mobile heavy equipment will be winterized and left secured on site. Any equipment not capable of withstanding the harsh winter conditions will be removed from site and stored until the next camp open.

4.2 Water Supply System

Water pumps, filtering systems, water lines, and any other equipment associated with the water supply system will be drained and winterized. The water pump shed will be secured.

4.3 Sewage System

The camp will be serviced by a Pacto toilet system; greywater lines will be drained so no water remains in the discharge pipe. Solid waste will be backhauled to Goose or George camps for incineration.

4.4 Electrical System

The generator and surrounding area will be inspected for signs of spills and remaining wastes such as oil and grease. If topsoil is contaminated, enviromat will be used to remove as much of the spill as possible; remaining contaminated soil will be stored in empty drums for disposal off site at an approved hazardous waste facility. The generator will be drained of its fuel. Remaining waste fuel, oil, and grease will be stored in approved storage containers which are labelled for that usage and reused during summer operations. The generator will be winterized and the shed will be secured for winter. Electrical wires, plugs, and sockets will remain in their installed locations. All electrical cords temporarily connected to a building or machinery during summer work program will be unplugged, rolled, and stored in the workshop.

4.5 Camp Heating Systems

Any 205-L fuel barrel attached to respective tents or buildings will be secured within the secondary containment container. The remaining fuel in the line will be allowed to burn out. The lid of the containment container will be secured to prevent snow from filling up the designated containment area. All empty propane cylinders will be transported off site for recycling.

4.6 Petroleum Products and Storage Facilities

An on-site fuel cache is of great importance during camp start-up. Diesel fuel will be stored in the 205 L drums within secondary containment. Minimal quantities of diesel and jet fuel in barrels will be stored within self-supporting artificial berms; these locations will be clearly marked to facilitate snow clearing activities during the following camp opening. The Site Superintendent will be responsible for determining the possible access to these fuel resources prior to the start of the next exploration program.

Empty drums at remote drill sites will be transported to the Goose camp, crushed, banded to pallets and either stored for future backhaul or transported off site for disposal/recycling. This work is typically done progressively as fuel caches are no longer required or as drill setups are dismantled.

Secondary containment areas will be cleared of any debris. In the springtime, meltwater within the containment area will be released if no visible sheen is noted. If visible sheen is noted an oil-water separator will be used to ensure the water is suitable for discharge, or the water will be transported off site for disposal. Residual water remaining after pump out as well as collected rainwater are allowed to evaporate over the summer and are unlikely to present a volume issue at camp shutdown in the fall.

The spill response team and camp management will be notified immediately of any spill based on actions outlined in the Comprehensive Spill Contingency Plan.

4.7 Chemicals

Chemicals stored on site would include drill additives, oil, grease, drill salt, and household biodegradable cleaners. Chlorine is necessary and is used to treat the camp drinking water system. All drill additives are stored in poly-lined seacans and the remaining salt will be tarped and stored in designated areas on the property. Drill salt is in impermeable bags and stored on pallets. Empty bags will be disposed with combustible garbage off site. Sabina will inspect the storage area for possible spills and contamination.

4.8 Spill Response Kits

Sabina will carry out an inventory of any spill kits located in the exploration area. Over the winter months, all spill kits will be relocated into a secured building, except for kits designated for any remaining petroleum storage areas.

4.9 Transportation

All transport areas will be inspected for contamination. Areas will be remediated using enviromat and removal of contaminated soil should contamination be found.

4.10 Drill Sites

Drills will be dismantled into the main components as per the drilling contractor procedure and secured along with ancillary equipment and drill rods. The drills will be moved by helicopter over the tundra and left at designated storage areas on the property and will undergo a drill close-out inspection. All drill sites will be inspected for contamination. Any remaining waste will be removed and disposed of accordingly. Diamond drill site restoration will commence as soon as practical after completion of the hole. Site clean-up of litter, debris, and drill fluids will commence immediately. Drill core and core boxes will be properly secured and stored at the designated core storage area. Photographs will be taken before and after the drilling has been completed.

4.11 General Camp Area

A general inspection of the camp area will be carried out. Waste items will be picked up, and areas contaminated by petroleum products unnoticed from the previous year will be reclaimed.

4.12 Final Documentation

A year-end inventory of all equipment and buildings remaining at the exploration area site will be carried out prior to leaving the site. Photos will be taken of the camp and drill laydown storage areas. Once the site is secured for winter, it will be documented with photos.

5.0 PERMANENT CLOSURE

5.1 Administration

5.1.1 Building Structures

All the reusable tents, frames, tarpaulins, and wooden structures will be dismantled and where possible be recycled for use at another exploration site.

Other combustible, non-recyclable building structures will be incinerated off site or burned onsite. Non-combustible structures or materials such as nails, screws, or metal frames will be recovered, packed, and transported off site for proper disposal.

5.1.2 Office and Household Furniture

All reusable office, household, kitchen, and recreational equipment will be packed and transported for use at other exploration camps. Some equipment, depending on what level of liability is accepted by Sabina, may be donated to local communities or schools. The equipment that is not reusable will be recycled or disposed of at an approved disposal facility off site, appropriate to the type of material.

5.1.3 Water Supply System

Water pumps, filtering systems, water lines, and any other equipment associated with the water supply system will be drained, disassembled, packed, and transported off site for use at other exploration camps. Water lines that are not reusable will be disposed of at an approved facility.

5.1.4 Sewage System

The Pacto toilet systems will be dismantled and relocated to another exploration camp or transported off site for disposal. All lines from showers, washing machines, and sinks will be drained, disconnected, securely packed, and transported off site to an approved landfill site.

5.1.5 Electrical System

All electrical wires will be removed from the buildings and any other installations at site. Extension cords and other fittings will be transported to other exploration camps for reuse. Used electrical wires will be packed and transported to off site for recycling. Unused bulbs and fluorescent tubes will be packed and relocated to other camps for appropriate disposal per their waste management plans.

The generator shed and surrounding area will be inspected for signs of spills and remaining wastes such as oil and grease. The area will be cleaned as necessary.

The generator will be drained of fuel. Remaining waste fuel, oil, and grease will be stored in approved storage containers, labelled, and transported off site. The generator will be dismantled and transported off site, either for reuse or for sale.

5.1.6 Camp Heating Systems

Each 205-L fuel barrel attached to tents or buildings will be disconnected, and any remaining fuel in the line will allowed to burn out. The drums will be appropriately labelled and stored with other petroleum products. The secondary containment container will be closed, secured, and stored ready for transportation off site. The fuel burner will be dismantled and remaining fuel will be allowed to drain off into a waste oil collecting system. All fuel lines will be drained, disconnected, and packed for use in other camps or transported to an approved disposal facility. The area around each installation will be inspected for contamination and reclaimed as per the Comprehensive Spill Contingency Plan. All empty propane cylinders will be transported off site for recycling.

5.1.7 Petroleum Products and Storage Facilities

5.1.7.1 205-Litre drums

The fuel storage area will consist of segregated groups of drums with empties stored separately from the full drums. An inventory of remaining fuel will be completed and all full drums will be inspected. Transportation of Dangerous Goods (TDG) labels will be attached to the drums before transportation off site. Remaining waste fuel will be labelled with TDG labels and transported to other camps for heating purposes or transported off site for disposal in an approved facility.

Empty drums will be crushed and palletized for backhaul and disposal. Some drums will be retained for waste containment and subsequent backhaul.

All unused jet fuel will be relocated to other exploration camps for use in further exploration programs, or backhauled off site. The areas around the drums will be inspected for contamination.

5.1.7.2 Tidy Tanks

All Tidy tanks will be disconnected from any tents or buildings. All installations will be disconnected and drained. An inventory of the remaining fuel in each tank will be recorded. The tanks will be secured and transported to other camps or off site for sale or disposal. The area around the tanks will be inspected for contamination.

5.1.7.3 Aboveground Storage Tanks and Bladders

All fuel storage systems will be disconnected and various hatches inspected and locked. An inventory of the remaining fuel in each tank will be recorded and all fuel tanks will be drained prior to transportation. Tanks may be moved during winter months via winter road to either another camp or the MLA to be loaded onto a barge for transportation off site during summer months.

5.1.9 Household Chemicals

Household cleaners will mainly be stored in the kitchen and mine dry/change room area. Upon camp closure, any unused products will either be transported to other camps or disposed of at an appropriate facility. Half-empty containers will be taken off site to be properly disposed in an approved discharge facility. Empty containers will either be recycled or disposed of with regular garbage, if appropriate.

5.1.10 Transportation

5.1.10.1 Airstrip

No new prepared airstrip is proposed for the potential future Wishbone-Malley camp.

However, should an airstrip be constructed reclamation may include scarifying the surface to promote natural revegetation.

5.1.10.2 Helipads

Helipads within the camp area would be dismantled, inspected for fuel spills, and original ground or gravel pad may be scarified or needed to promote natural revegetation.

5.2 Exploration

As part of Sabina's progressive reclamation activities, diamond drill sites are progressively reclaimed as soon as practical after the drill has been moved to the next site. Details of drill site progressive reclamation activities are provided in Section 3.2. Any outstanding activities will be completed in full for permanent closure.

All drilling equipment will be dismantled to the extent necessary for transport off site by helicopter or winter trail.

All remaining drill additives and salt will be inventoried, packed, and transported to other projects or transported off site for re-sale or disposal at an appropriate facility. Empty containers and pallets will be incinerated (pallets), recycled if possible or disposed of with regular garbage.

Drill core will be properly secured and stored at a designated core storage area on the property for long-term storage. A site reference plan will be maintained to catalogue the core.

5.3 Environmental

5.3.1 Long-term Monitoring

Ongoing monitoring will be conducted during the summer months to ensure the area has been cleared of any hazards that may cause a significant adverse impact to the receiving environment. The monitoring will continue on a set schedule after the final abandonment until the land is relinquished to, and accepted by, the owner. Any weather collection data and environmental baseline data (e.g. water sampling data) will be turned over to whoever takes over the property.

5.3.2 Documentation and Final Inspection

A detailed site reclamation and remediation report for the Wishbone-Malley Exploration Area will be created by Sabina which will specifically document and catalogue the exploration area reclamation activities. This report will be generated for distribution to specific governing agencies. This report will identify all reclamation efforts undertaken at the exploration area and will be supported with information pertaining to contractors used, methodology, costs, and findings. Digital photographs will be taken which will support the reclamation activities. These will be appended to the report.

5.3.3 Land Relinquishment

Once the reclamation plan is accepted and approved by Sabina, the permit holder will invite and organize a final site inspection visit with community representatives, Land Inspectors, Nunavut Water Board and the KIA. Other government organizations, such as Environment and Climate Change Canada, and Department of Fisheries and Oceans, will be invited to visit the area. A written submission will be sent to the regulatory authorities asking to relinquish the land.

5.4 Abandonment & Restoration Cost Estimates

The total cost estimation for the Abandonment and Restoration Plan for the Wishbone-Malley Exploration Area would be based on the infrastructure and equipment constructed and positioned should a temporary camp be erected. The approximate costing would be reviewed periodically based on site activities and development and may include consideration of the following:

- Infrastructure Demolition Cost;
- Transportation – (Labour, equipment, recycle, relocation of waste, etc.);
- Labour Cost;

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- Offsite Administrative Cost;
 - Contractor;
 - Rehabilitation Cost;
 - Site Supervision – (Sabina);
 - Remedial supplies;
 - Native species supplies;
 - Contractor;
 - Environmental Monitoring Cost;
 - Labour - (Sabina or Contractor);
 - Transportation – (Field sampling);
 - Analytical Cost – (External Lab);
 - Reporting – (Sabina or Contractor);
 - Consultant Costs;
 - Final Documentation – (Labour Cost – Sabina or Contractor); and
 - Land Relinquishment – (Travel, Reports, Site Visits, Meetings, etc.).

6.0 REVIEW OF THE ABANDONMENT AND RESTORATION PLAN

The Wishbone-Malley Exploration Area Abandonment & Restoration Plan will be reviewed based on changes in project development and activity and updated as needed.