Teck Pogo, Inc.
Pogo Mine Joint Venture
P.O. Box 145
Delta Junction, AK USA 99737

+1 907 895 2841 Tel
+1 907 895 2866 Fax
www.teck.com

November 12, 2008

Tim Pilon
Environmental Program Specialist III
Alaska Department of Environmental Conservation
Division of Water
610 University Avenue
Fairbanks, AK 99709-3643
7008 0150 00017953 5353
RE: Waste Disposal Permit 0131-BA002

Dear Tim:

In accordance with 18 AAC 15.100(d), Teck-Pogo, Inc. is formally requesting an administrative extension and subsequent renewal of the Alaska Department of Environmental Conservation Waste Disposal Permit 0131-BA002, which would otherwise expire on December 18, 2008. As discussed with you, Jack Winters, and Jack DiMarchi on October 6, 2008, Teck-Pogo is working on a number of fronts to update our plan of operations in support of permit renewal, including the water balance, to reflect site experience.

Work currently underway includes review of site precipitation, an extensive WAD cyanide monitoring program, a review of the Pogo Mine hydrology to determine mine inflow rates, and an update to the mine inflow model. The results of this work will likely result in changes to our mine operations and water management plan. We also intend to seek a site-specific MDL for WAD CN in the Pogo Mine Outfall 001, which will involve the use of three laboratories and multiple sampling locations. The plan for implementing this project is being developed now and we will work with you and the EPA to finalize the plan prior to initiating any work. Once the agencies have reviewed and approve the plan, Pogo will implement the sampling program and use the results to develop and identify the site specific MDL.

The target date for completing the various reviews and incorporating the findings into the permit applications is anticipated to be completed during the second quarter of 2009. As documents become available, we will submit them to you such as the revised Draft Reclamation Plan, the updated Draft Mine Closure Cost Model and the updated Draft Right of Way Reclamation Cost Estimation Model which were submitted to DNR for distribution and review on October 30, 2008.

Teck Pogo, Inc.
Pogo Mine Joint Venture
P.O. Box 145
Delta Junction, AK USA 99737

+1 907 895 2841 Tel
+1 907 895 2866 Fax
www.teck.com

As part of the renewal process, we have identified several items in the current Solid Waste Disposal permit that should be revised in the permit including the following:

1. We intend to incorporate the surface landfill into the drystack facility rather than constructing a separate surface landfill as originally proposed. The surface landfill will be operated as discrete cells within the drystack facility and will be periodically encapsulated in compacted tailings with a minimum cover of two feet. This change may justify minor word changes in several sections of the permit—such as Sections 1.1.1, 1.1.2 and 1.1.3, which refer to the surface landfill as a separate facility.

2. The compliance points MW-503 and MW-504 in Section 1.1.4 should be deleted. These monitoring wells were installed down gradient from the originally proposed surface landfill and are no longer relevant. No solid waste was ever placed at the proposed location, which is being used as a growth media stockpile for drystack closure.

3. The text discussing the detoxification performance standard for cyanide in Section 1.2.3 should be changed to "90% below 10 ppm WAD CN and 100% below 20 ppm WAD CN, based on analysis of the interstitial water entrained in the CIP tailings prior to placement in the paste backfill".

4. The use of "non-mineralized" mine development rock in the shell area of the drystack should be incorporated into the language of the permit in addition to the current language discussing the use of compacted tailings originally planned for the shell area.

If you have any questions or need additional information, please give me a call.

Sincerely,

Larry Davey
General Manager

cc: Jack DiMarchi, Large Mine Coordinator, DNR

7008 0150 0001 7953 5346