

June 20, 2025

William Groom  
Alaska Department of Natural Resources  
3700 Airport Way  
Fairbanks, AK 99709

**Reference: Anarraaq and Aktigiruaq Exploration Program Plan of Operations (F2022-9339-POOA) Amendment 2 & Reclamation Plan (F2022-9339-RPA) Amendment 4**

Dear Mr. Groom,

Teck American Incorporated (TAI) is submitting the enclosed documents in support of amending our approved Plan of Operations (F2022-9339-POOA) and Reclamation Plan (F2022-9339-RPA) for the Anarraaq and Aktigiruaq Exploration Program (Project).

The Project is located approximately 50 miles northeast of Kivalina, Alaska and 35 miles north of Noatak, Alaska on lands owned by the NANA Regional Corporation and the State of Alaska.

TAI is implementing mineral exploration activities authorized under Plan of Operations No. F2022-9339-POOA and Reclamation Plan No. F2022-9339-RPA approved by the Alaska Department of Natural Resources, in addition to a Section 404 Permit (POA-2018-00075) issued by the U.S. Army Corps of Engineers, a Section 401 Water Quality Certification issued by the Alaska Department of Environmental Conservation, a Conditional Use Permit approved by the Northwest Arctic Borough (No. 119-03-22), an Access and Land Use Agreement with NANA Regional Corporation, and other regulatory approvals.

TAI's purpose and need for the Project remains unchanged and focuses on implementing a multi-year exploration drilling campaign to assess the technical characteristics and economic viability of the Aktigiruaq and Anarraaq mineral deposits. Both deposits contain zinc and germanium, which the Secretary of the Interior, acting through the Director of the U.S. Geological Survey, included in the 2022 Final List of Critical Minerals (87 Fed. Reg. 10381). Therefore, this critical mineral project meets applicable definitions of 30 U.S.C. 1606 (a)(3) and Executive Order 14156 *Declaring a National Energy Emergency*.

Described more fully in the enclosed documents, TAI proposes moving the underground exploration portal approximately four miles south along the A-A-Exploration Access Road, modifying the layout of certain gravel pads and access roads, and removing certain gravel pads, access roads, and a material site from the Authorized Action. The proposed changes will improve safety and efficiency, while further avoiding and minimizing potential environmental effects. TAI will continue to fully comply with all conditions of our existing regulatory approval and proposes no changes to the existing permit stipulations.

TAI met in-person with representatives of NANA Regional Corporation on April 29, 2025, with the Noatak IRA on May 1, 2025, and with the Kivalina IRA and Kivalina City Council on May 2, 2025, to discuss the Modified Action. We provided NANA, Kivalina IRA, Noatak IRA, and Kivalina City Council with draft versions of the enclosed Plan of Operations and Reclamation Plan for review on May 9, 2025. Additionally, TAI met in-person with NANA, Kivalina IRA, and Noatak IRA on December 12, 2024, and again February 21, 2025, to discuss Project activities and community interests. TAI has considered community input in the Modified Action.

We look forward to working with you and the Large Mine Permitting Team to ensure an appropriate and timely review of the Modified Action. Please contact Jacob Rowland at (907) 229-7527 or [Jacob.Rowland@teck.com](mailto:Jacob.Rowland@teck.com) if you have questions or require additional information.

Sincerely,

Kyle Moselle  
Manager, Social, Environmental, Regulatory Approvals  
Teck

Enclosures:

- Plan of Operations Modification Anarraaq and Aktigiruaq Exploration Program [proposed Amendment 2]. *Please note that Appendix E contains confidential cultural resource information.*
- Anarraaq and Aktigiruaq Exploration Program Reclamation Plan [proposed Amendment 4].
- Anarraaq and Aktigiruaq Exploration Program Reclamation Plan Basis of Estimate.
- SRCE Model for the Anarraaq and Aktigiruaq Exploration Program.
- SRCE Cost Data File for the Anarraaq and Aktigiruaq Exploration Program
- Non-objection letter from NANA Regional Corporation

Cc:

- Mike Goetz, Project Director, Teck
- Jacob Rowland, Regulatory Lead, Teck
- Heidi Tillquist, Environmental Sr. Lead, Teck
- Lee Helmsen, Community Relations Sr. Lead, Teck
- Caitlin Kennedy, Large Project Coordinator, ADNR-OPMP
- Tim Pilon, Engineer, ADEC-DOW-Mining