

Department of Natural Resources

DIVISION OF MINING, LAND & WATER Mining Section

550 West 7th Avenue, Suite 9008 Anchorage, Alaska 99501-3577 Minerals Property Management Main: 907.269.8642

Fax: 907.269.8949 Coal Regulatory/Abandoned Mine Lands Main: 907.269.8631 Fax: 907.269.8930

TTY: 711 or 800-770-8973

January 16, 2025

Jacob Rowland
AAEP Regulatory Approvals Lead
Teck American Incorporated
501 North Riverpoint Boulevard, Suite 300
Spokane, WA 99202

Subject: Anarraaq and Aktigiruq Exploration Program Reclamation Plan Approval F20229339RPA.02 Request to Phase Financial Assurance

Dear Mr. Rowland:

On January 16, 2025, the Division of Mining, Land and Water (DMLW) received correspondence from Teck American Incorporated (TAI) dated January 15, 2025, requesting to phase in financial assurance (FA), approved under Reclamation Plan Approval F20229339RPA.02 issued September 21, 2023, over the next two winter construction seasons.

The DMLW Mining Section has reviewed and consulted with the Alaska Department of Environmental Conservation (DEC) on the proposed phasing of the financial assurance. Under 11 AAC 97.415(a) (Acreage to be bonded), the acreage that must be bonded prior to mining operations are limited to the area that is to be mined during the calendar year and any previously mined area that has yet to be reclaimed. The DMLW Mining Section therefore concurs with TAI's proposal for a phased increase of the FA. The current FA is adequate for the winter 2024/2025 construction season. Prior to the winter 2025/2026 construction season, TAI will submit the FA amount adequate to account for the increase due to the proposed activities and disturbance, along with the annual adjustment for inflation based on the Anchorage CPI for the approved project activities and disturbance.

The requested amendment to the Reclamation Plan dated January 15, 2025, is hereby approved as *Anarraaq-Aktigiruq Exploration Program Reclamation Plan Amendment Approval F20229339RPA.03*. Nothing in this decision changes the conditions of the original Reclamation Plan Approval dated August 12, 2022.

Please be advised that this authorization does not eliminate the potential need for authorization of your activity from other Federal, State, or local divisions or agencies.

If you have any questions regarding this request, please contact William Groom at 907-451-2788.

An eligible person affected by this decision may appeal to the DNR Commissioner per AS 44.37.011 and 11 AAC 02. Any appeal must be received within twenty (20) calendar days after issuance of this decision under 11 AAC 02.040. An eligible person must first appeal a decision to the Commissioner before seeking relief in superior court. The Alaska Court System establishes its own rules for timely appealing final administrative orders and decisions of the department.

Appeals may be mailed or hand-delivered to the DNR Commissioner's Office, 550 W. 7th Avenue, Suite 1400, Anchorage, Alaska, 99501; or faxed to (907)-269-8918; or sent by electronic mail to dnr.appeals@alaska.gov. Appeals must be accompanied by the fee established in 11 AAC 05.160(d)(6), which has been set at \$200 under the provisions of 11 AAC 05.160 (a)-(b). A .pdf or print copy of 11 AAC 02 may be obtained by contacting Hannah Pothast via phone at (907) 269-3565, via email at hannah.pothast@alaska.gov, and is also available on the department's website at https://dnr.alaska.gov/mlw/pdf/DNR-11-AAC-02.pdf.

Sincerely

Steve Buckley

Mining Section Chief

Enclosure: Copy of TAI January 15, 2025, Reclamation Plan Amendment Request

Cc: William Groom, DNR

Aaron Kruse, DNR Caitlin Kennedy, DNR Kindra Geis, DNR

Audra Brase, ADF&G

Holly Wynne, TAI

Carolyn Curley, DNR Jesse White, DNR

Jenny March, DNR Tim Pilon, DEC

Kyle Moselle, TAI