

Red Dog Reclamation & Closure Plan – Solar Farm Facility

Operator: Teck – Red Dog Mine

Facility: Solar Photovoltaic Facility

Area: ~30 acres

Date: February 23, 2026

SRCE Model: Red Dog SRCE Solar Farm Final – 2026-02-23 rev2.xlsm

1. PURPOSE AND SCOPE

This Reclamation Closure Plan (RCP) describes the measures to decommission, reclaim, and stabilize a 30-acre solar photovoltaic (PV) facility adjacent to an existing mine site in Alaska. The plan supports State of Alaska closure requirements and establishes Financial Assurance (FA) sufficient to complete closure under a third-party using a close-tomorrow scenario.

If the project is sanctioned and proceeds, this RCP will be updated and incorporated in principle into the main Red Dog Mine RCP currently being updated for the 5-year renewal (September 2026). It is anticipated that the solar facility will be retained to support post-closure water treatment and related closure-phase energy requirements at the Red Dog Mine. In that event, the solar facility would be maintained and periodically overhauled as part of ongoing closure operations.

2. SITE DESCRIPTION

The solar facility is projected to occupy approximately 30 acres and includes ground-mounted PV racks and panels (36 units), internal access roads, surface electrical infrastructure, battery energy storage systems housed in four enclosed 20-foot containers, and minimal buried utilities (beneath road or culvert). The proposed facility area does not encounter wetlands areas. The facility does not include waste rock, tailings, ponds, wells, or process water systems. Access is via existing mine infrastructure, with barge transport required for initial heavy equipment and materials needed for the installation and for battery pack replacement (removal).

3. CLOSURE OBJECTIVES

Closure objectives are to remove all solar infrastructure, properly manage demolition materials, restore stable landforms and drainage, reestablish vegetation compatible with surrounding reclaimed mine lands, and eliminate long-term environmental liabilities.

4. CLOSURE AND WASTE MANAGEMENT

Solar infrastructure will be dismantled using a medium excavator with shear and grapple attachments. Panels will be separated from racking, steel cut to size, and anchors removed to approximately one foot below grade. Tarps may be used to collect glass if required. Incidental concrete may be required during construction for pilings where field geotechnical conditions do not allow the use of earth anchors. The cost model includes an allowance for approximately 300 cubic feet of concrete demolition, representing an estimated 20% of 3,000 total piles at 0.500 cubic feet per pile for the portion extending one (1) foot below grade. The below-grade portions of concrete pilings are assumed to be abandoned in place.

Concrete demolition is assumed to be completed using a medium excavator equipped with a multi-processor attachment. All demolition debris will be disposed of at the on-site landfill using a loader and dump truck. Solar panels acquired for this project are not considered hazardous waste under RCRA based on manufacturer provided TCLP data. The landowner (NANA) has no objection to solar panels being placed in the onsite landfill.

Four battery units (20-foot containers, ~89,000 lbs. each) will be shipped off-site for disposal. Barge transport will be coordinated with other mine site closure shipments. Disposal fees are included per SRCE unit rates.

Culverts will be removed using a loader and disposed of at the onsite landfill. Surface power cable (approximately 16,000 linear feet) will be removed by a labor crew utilizing pickup trucks and disposed of at the onsite landfill. The approximate cable run was estimated from the drawing titled "Cable Routing from Solar Array" using the scale bar.

Access roads will be reclaimed by removing approximately 48 inches of gravels underlain with geosynthetic fabric and hauling the material to the mine landfill, followed by grading (berm removal) and revegetation if necessary. A small excavator will be used for recontouring, and a support fleet consisting of a loader, haul truck, and dozer will be used for loading and haul operations. Most of the vegetation covered by the geosynthetics is expected to recover once the gravel and liner are removed. Yard Cleanup will include general cleanup of garbage and debris, filling potholes around screw anchors, and minor revegetation touch-up through hand seeding where required. Yard cleanup is assumed to require 210 crew hours (3 weeks × 10 hours/day × 6 days/week) consisting of three general laborers, a foreman, a supervisor's truck and a light truck – 1.5 Ton, see Other User tab.

5. REVEGETATION AND MAINTENANCE

Revegetation, if necessary, will follow the removal of the gravel and geosynthetics using approved seed mixes. Any ground areas in which the excavator had accidentally removed or disturbed vegetation will be manually seeded by a labor crew utilizing pickup trucks for access and material transport. The SRCE model is conservative regarding revegetation and accounts for 100% of the former roadways requiring seeding and fertilizer. It is assumed that 15% of reclaimed areas which required seeding will require reseeding or touchups annually for five years, followed by 10% annually for an additional five years. Fertilizer will be applied if needed to promote vegetation growth. All revegetation will be manually hand broadcasted by a labor crew utilizing pickup trucks for access and material transport.

6. WATER MANAGEMENT AND MONITORING

No water treatment or long-term monitoring is required.

7. CLOSURE SCHEDULE

Closure activities will be completed within one construction season.

8. CONSTRUCTION AND CLOSURE MANAGEMENT

Closure activities will be overseen by a qualified project manager responsible for contractor management, logistics, field coordination, and interface with the adjacent mine site closure team. Project management duration is assumed to be approximately four months.

9. FINANCIAL ASSURANCE SUMMARY

The estimated closure liability is \$1,885,597 assuming no discounting of closure-phase costs. The liability estimate is provided in the attached SRCE model and is based on the prior 2021 FA Mine Site cost data file and assumptions with a CPI update (2020 to 2025).

Standard markups include:

- Engineering, Design and Construction Planning: 5.0%
- Contingency 15% and CPI (2020-2025) 15% = 30.0%
- Contractor Overhead and Profit: 13.0%
- Contract Administration: 6.5%