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August 31, 2020

Emily Hart
Large Project Coordinator
Alaska Department of Natural Resources
Office of Project Management and Permitting

Dear Ms. Hart

Reference: Red Dog 5 year Audit Extension Request

In the spring of 2020 Red Dog Operations (RDO) selected HDR Engineering, Inc. (HDR) to complete the 5 year Environmental Audit for the RDO per requirements in both the Waste Management Permit (2016DB002) and Reclamation Plan Approval (F20169958). At that time the impacts of the COVID-19 pandemic were still evolving and it was not clear if pandemic conditions were going to improve or worsen. As result of this uncertainty RDO and HDR determined that the safety of on-site staff at the Mine as well as the safety of the auditors most of whom must travel from the Lower 48 States should be of the highest priority and it was decided to delay any Audit work for the time being.

In June, HDR's Project Manager again contacted the audit team members located in the Lower 48 States regarding traveling to Alaska to complete the Audit. The HDR audit team members expressed serious concern about traveling given the current pandemic conditions. This combined with the existing challenges of traveling to Alaska from the lower 48 have created unforeseen circumstances to safely travel and complete the audit this year. As a result, RDO and HDR are requesting to delay the Environmental Audit until 2021. An important aspect of the Audit is that the field work must be completed prior to freeze-up during thawed conditions, meaning that the on-site field tasks need to be complete no later than mid to late September. With this consideration both RDO and HDR recommend pre-audit tasks for the Audit are rescheduled to occur February thru April 2021 with on-site field tasks to be completed in the spring of 2021 or as soon as the snow has melted from the site. Under this proposed schedule the anticipated completion date for final Audit report would be August 2021. This effort will require expedited development and review efforts by both the Audit Team as well as by ANDR and ADEC.

We appreciate any flexibility from ADNR during these unusual circumstances. RDO and HDR will continue to coordinate with ANDR and will alert you if there is change in the conditions described above. If you have any questions please let me know.

Sincerely,

Frank Bendrick
Environmental Coordinator
Red Dog Operations