



CALISTA CORPORATION
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January 11, 2023

Mr. Dave Jones
Engineering Associate I
Air Permit Program
P.O. Box 111800
Juneau, AK 99811

RE: Notice of Application for Air Quality Control Permit AQ0934CPT02 Donlin Gold LLC, Donlin Gold Project

Dear Mr. Jones:

On behalf of Calista Corporation (“Calista”), the Alaska Native Claims Settlement Act (“ANCSA”) Regional Corporation for the Yukon Kuskokwim Region of Alaska, we thank the Alaska Department of Environmental Conservation (“ADEC”) for the opportunity to comment on the notice of application for Air Quality Control Permit AQ0934CPT02 Donlin Gold LLC (“Donlin Gold”).

Donlin Gold has proposed the development of an open pit, hard rock gold mine in Southwest Alaska (“Project”). The Project is in lands owned by Calista and The Kuskokwim Corporation (“TKC”). Calista supports the ADEC’s preliminary decision to issue Donlin Gold Air Permit AQ0934CPT02.

The ADEC issued Air Permit AQ0934CPT01 to Donlin Gold on June 30, 2017. The permit authorized the installation of twelve (12) ultra-low sulfur diesel/natural gas-fired power generation units, boilers, emergency generators, incinerators, and other equipment. Condition 1.2 of the Air Permit required Donlin Gold to commence construction of the authorized facilities within 18 months from the date of the permit, i.e., December 30, 2018, unless granted an extension in writing. ADEC granted three 18-month extensions which required the Project to commence construction no later than June 30, 2023.

The purpose of the third extension approval was solely to allow the project to continue as planned while the ADEC processes the new permit application AQ0934CPT02 with all the updated application elements, including Best Available Control Technology (“BACT”) and ambient air quality modeling. Calista believes that the updated BACT and ambient analyses provide a more robust basis for continuation of the Project and supports ADEC’s preliminary decision to approve Donlin Gold’s application for Air Quality Control Permit AQ0934CPT02.

Sincerely,

Tisha Kuhns
Vice President, Land and Natural Resources
Calista Corporation