



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

October 17, 2019

James Gowans  
Interim President and Interim Chief Executive Officer  
Trilogy Metals Inc.  
Suite 1150, 609 Granville Street  
Vancouver, British Columbia  
Canada, V7Y 1G5

**Re: Trilogy Metals Inc.**  
**Registration Statement on Form S-3**  
**Filed October 10, 2019**  
**File No. 333-234164**

Dear Mr. Gowans:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Anuja A. Majmudar, Attorney-Advisor, at 202-551-3844 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Energy & Transportation

cc: Kimberley R. Anderson