

February 20, 2025

Nathaniel Hofland  
United States Steel  
P.O. Box 217  
1 Old Mine Road  
Keewatin, MN 55753

**RE: United States Steel Keetac Permit to Mine Tailings Storage Facility Mining Area**

Dear Mr. Hofland,

United States Steel (US Steel) Keewatin Taconite (Keetac) and the Department of Natural Resources (DNR), Division of Lands and Minerals (LAM) have been in discussions about recently discovered mapping inaccuracies for the Permit to Mine Mining Area (Mining Area) for the Keetac Tailings Storage Facility (TSF). This information was noted during several discussions regarding the pending Keetac Basin Phase II Project. Both Keetac and LAM agreed that the mining area around the Keetac TSF should be revised to include all historical, permitted disturbances to arrive at a more accurate and modern Mining Area (as defined in MN Rules Chapter 6130.0100, subpart 9).

It was noted that the use of GIS and other programs has led to far more accurate line projections as compared with early means of digital mapping and previous technologies. Keetac and LAM have both reviewed historical documents and have discussed the findings at several meetings.

Per LAM's request, Keetac produced an initial map indicating proposed changes for line revisions to the Mining Area, submitted on February 13, 2024. Keetac also provided historical documentation. A revised submission, annotating the historical references, was received on May 9, 2024. Keetac and LAM met on June 6, 2024, to discuss the revised submission. LAM requested Keetac provide a corresponding shapefile of proposed changes which Keetac provided on June 7, 2024.

The DNR concurs with a majority of the June 7, 2024 GIS package representation of the Mining Area (DNR Map 1). Two exceptions are as follows.

1. Mesabi Chief 2 Dams. The DNR will not include the Mesabi Chief 2 Dams because this area, although owned by US Steel, is not a part of the mining operations at Keetac. This was discussed and agreed upon with Keetac staff on December 6, 2024. DNR Map 1 was revised to remove this area as compared with the June 7, 2024 GIS package.

2. Reservoir 2: Reservoir 2 access and southern dam are depicted on DNR Map 1, along with the proposed Mining Area. Inclusion of this area is appropriate as Reservoir 2 and its use are a part of the mining plans at Keetac. What remains in question is the inclusion of Reservoir 2 itself and the footprint of the auxiliary facility (“in discussion” portion of Reservoir 2 on DNR Map 2). Future discussions will include a determination of whether or not reservoirs and associated footprints will be included as part of Keetac’s Mining Area, and the appropriate shape.

Note that concurrence with the more accurate Mining Area for the Keetac TSF does not allow for new construction to occur within or beyond the Mining Area without assessing the potential need for environmental review, conducting environmental review, if needed, and obtaining any appropriate permits or approvals, if needed. Based on the current proposed Keetac Basin Phase II Project, environmental review and a Permit to Mine Amendment or Modification will be required to initiate construction, including within the Mining Area, for the TSF as shown on DNR Map 1.

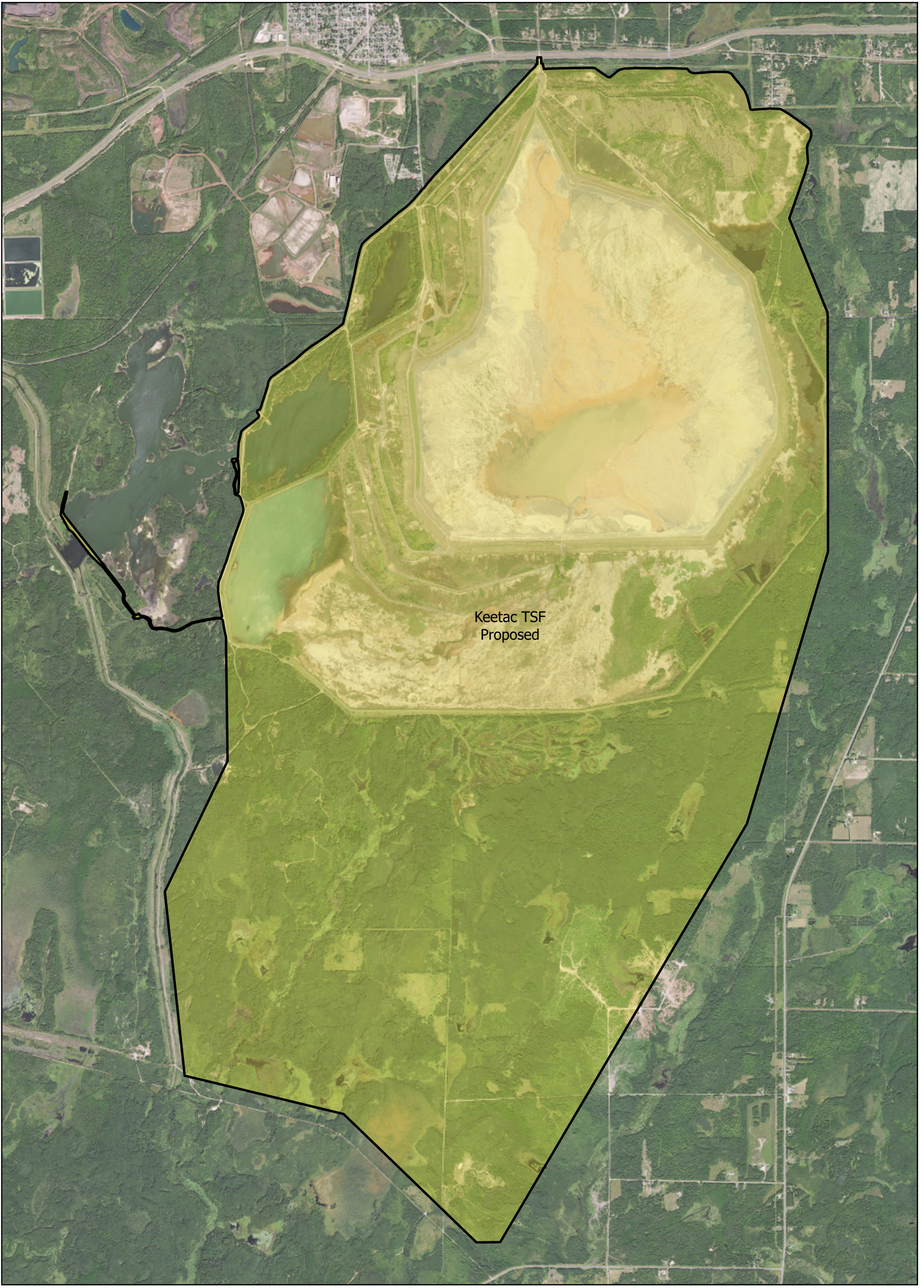
Please feel free to contact me if you have any questions.

Sincerely,

Michael Liljegren  
Assistant Director  
Division of Lands and Minerals  
Michael.Liljegren@state.mn.us  
651-259-5689

Attachment: DNR Map 1. United States Steel Corporation Keetac Mining Area Revisions  
DNR Map 2. United States Steel Corporation Keetac

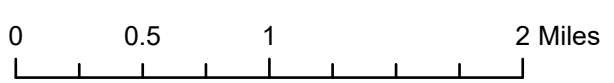
EC: Jennifer Engstrom, Reclamation Manager  
Kathryn Larson, Reclamation Supervisor  
Malory Sauter, Mineland Reclamation Specialist Sr.



Keetac TSF  
Proposed

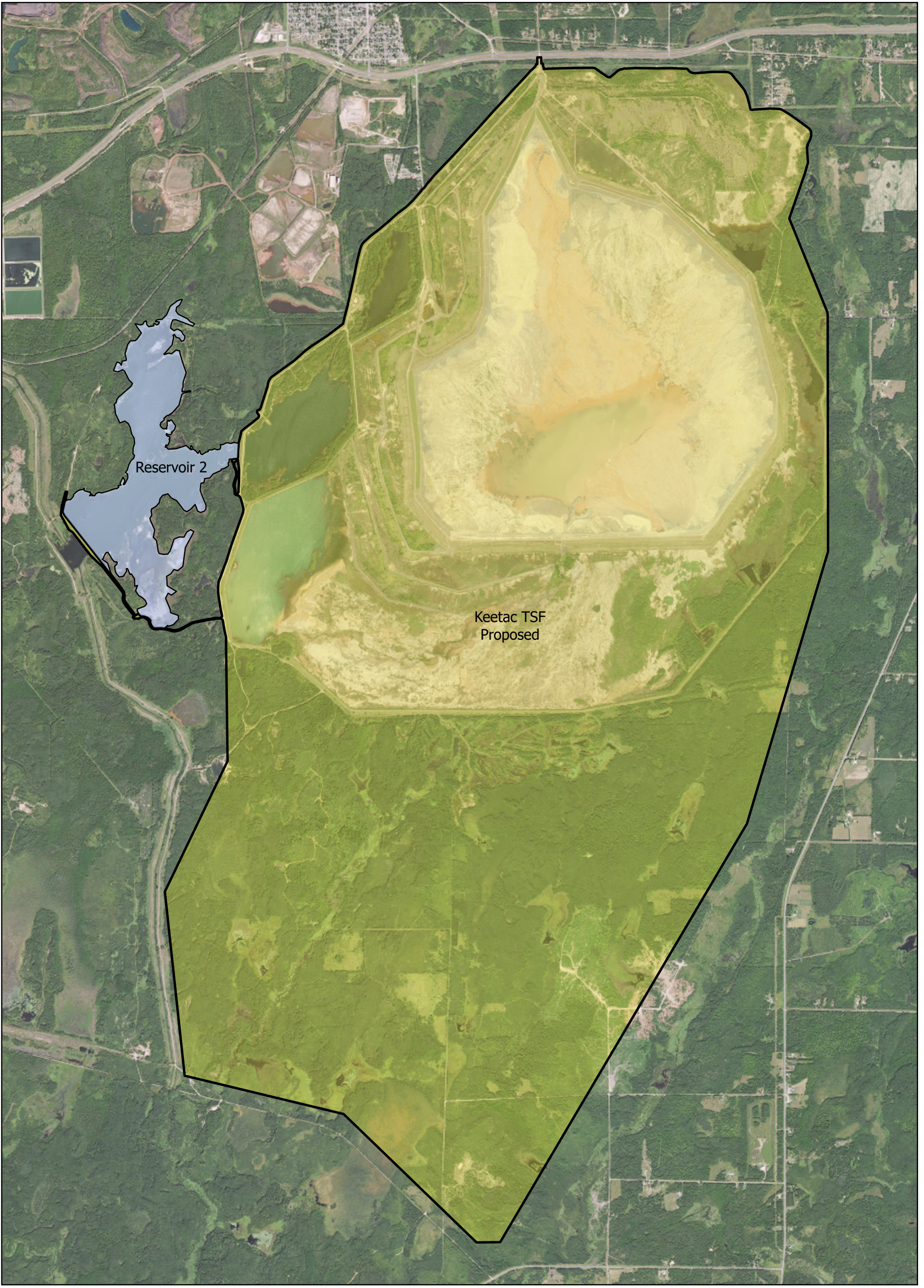


DNR Map 1 - United States Steel Corporation Keetac Basin Mining Area Revisions

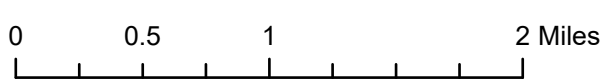


**Legend**  
KT Mining Area - TSF  
Status



	Proposed
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DNR Map 2 - United States Steel Corporation Keetac Basin Mining Area



**Legend**  
KT Mining Area - TSF  
Status

	Proposed
	In-Discussion