

Appendix G

Keetac Tailings Basin Expansion Groundwater Sensitivity Assessment

Technical Memorandum

To: Tom Moe and Darren Gietzen
From: Barr Engineering Co.
Subject: Keetac Tailings Basin Expansion Groundwater Sensitivity Assessment
Date: April 8, 2022
Project: 23311410
c: Bethany Jones

1.0 Introduction and Objectives

United States Steel Corporation, Minnesota Ore Operations – Keetac (Keetac) is in the process of Wetland Conservation Act (WCA) permitting through the Minnesota Department of Natural Resources (MnDNR) for Phase 1 of the Keetac Tailings Basin Management Project (“the Phase 1 project”) (Figure 1). The project includes limited tailings deposition within the currently inactive Stage 2 Exterior Tailings Basin (Exterior Basin) as the majority of the tailings deposition will be along the toe of the Stage 2 Interior Tailings Basin embankment to provide stability improvement. Tailings were deposited in the Exterior Basin prior to 1998 when the containment berm was completed for the Stage 2 Interior Tailings Basin (Interior Basin). Keetac generally owns the property beyond the Exterior Basin to north of U. S. Highway 169; west to the O’Brien Creek diversion channel; south to the Alborn-Pengilly Trail and County Highway 16; and east to the West Swan River (Figure 2).

The purpose of this technical memorandum is to evaluate the potential for the construction and operation of the Phase 1 project to cause “significant adverse effect on groundwater quality” per Minnesota Rules 8420.0515 Subp. 6. Analyses presented here are supplemental to those included in the Wetland Replacement Plan submitted October 12, 2021, and to updates dated February 24, 2022.

The evaluation approach utilized in this memorandum is consistent with the concepts and framework from “Criteria and Guidelines for Assessing Geologic Sensitivity of Ground Water Resources in Minnesota” (MnDNR, 1991). This evaluation includes a review of geology, hydrogeology, and groundwater quality data.

Because a “significant adverse effect on groundwater quality” is not specified in Minnesota Rules, this evaluation compares constituents of interest (COI) to applicable standards. Chloride, sulfate, and total dissolved solids (TDS) were selected as COIs due to their typical prevalence in Iron Range tailings basins relative to background groundwater and the use of chloride and sulfate as tracers for tailings basin seepage (Kelly et al., 2016). Groundwater quality was compared to the Environmental Protection Agency (EPA) secondary drinking water standards (sMCLs) as the most stringent standards for sulfate and TDS. Groundwater quality was also compared to the class 2B surface water quality standard for chloride as a more stringent standard than the EPA sMCL (230 mg/L vs. 250 mg/L) that is applicable to downgradient

surface water bodies (Hay Creek, Unnamed Creek – Reservoir 2 to Hay Creek, Welcome Creek, and West Swan River).

As described in further detail in subsequent sections, the Phase 1 project is anticipated to have limited potential to cause “significant adverse effect on groundwater quality”.

2.0 Project Description

Detailed information describing the project is available in the *Keetac Tailings Basin – Permit to Mine Amendment* prepared by GEI Consultants (2022). The following summary of the Phase 1 project includes information from that document as it pertains to the potential for the Phase 1 project to impact groundwater.

The proposed Phase 1 project is a near-term interim solution for Keetac to transition to a longer-term Tailings Basin storage alternative (Phase 2) that utilizes tailings storage within the full area of the Stage 2 Exterior dike. The long-term solution (Phase 2) will address the tailings storage for 40-plus years to align with mine life and will be completed as a separate project. The Phase 1 project consists of the construction of external dike raises (as currently permitted by the existing dam safety permit) to maintain freeboard, and internal diversion dikes to allow for controlled deposition of tailings within the Stage 2 Exterior Tailings Basin to provide stability improvement to the Stage 2 Interior Tailings Basin embankment. The Phase 1 project is intended to allow for safe operation of the existing active Stage 2 Interior Tailings Basin to maintain production of taconite pellets at the Keetac processing facility. This near-term solution (Phase 1) is needed to provide stability improvement for the Stage 2 Interior dike and suitable tailings storage while Tailings Basin engineers complete additional analyses, design, and permitting for the long-term tailings storage solution (Phase 2). Locations of the proposed dike raises and diversion dikes for the Phase 1 project, as well as a near-term tailings discharge schematic, are graphically depicted in Appendix A.

2.1 Pumping and Water Management

The tailings will be released using the same pumping system and level of energy as is currently required. The same pipeline could be used to discharge tailings downstream from the Stage 2 Interior Tailings Basin south dike embankment. Tailings deposition would shift into the Stage 2 Exterior footprint instead of the Stage 2 Interior footprint. This change will bypass the decant system within the Stage 2 Interior Basin. The return water circuit will remain the same, with tailings discharge water reporting to the Stage 2 Exterior Pond, flowing through the Stage 2 Exterior decant structure into Reservoir Six, and then being pumped from Reservoir Six to the processing facility. A new tailings pond will not be developed in the Stage 2 Exterior Tailings Basin as part of the Phase 1 project. Appendix A shows a summary of the current discharge pumping and flow regime for the Stage 2 Interior Tailings Basin as well as potential near-term pumping concepts for the Phase 1 project.

2.2 Dike Raises

The dike raises will be completed prior to deposition of tailings. The internal diversion dikes (northwest and west) are necessary to prevent tailings from spreading directly into the Stage 2 Exterior Pond. The external dike raises (east and south) will be used to maintain freeboard in the Tailings Basin as tailings and water spread outward.

2.3 Tailings Deposition

The Phase 1 project involves discharge of tailings from piping along the south, west, and east Stage 2 Interior Tailings Basin dike embankment (Appendix A). The majority of tailings will be deposited along the outer slope of the dike with fines spreading outward into the Stage 2 Exterior Basin onto existing tailings that were previously deposited in the area. This will result in variable depths of tailings that are generally deepest near the Stage 2 Interior and become gradually thinner outward, with minimal tailings deposition likely near the outer embankment, which is nearly one mile downstream. The Phase 1 project will not increase the size of the Tailings Basin and does not impact any areas that have not previously been used for tailings storage. Appendix A shows the expected discharge schematic for the Exterior Tailings Basin. During the Phase 1 project, U.S. Steel plans to maintain flow rates into and out of the Tailings Basin similar to existing conditions.

U. S. Steel's geologist does not expect the quality of tailings deposited in the Keetac Tailings Basin to change as mining and ore processing continues into the future. Future mining at Keetac will continue in the Upper and Lower Cherty units of the Biwabik Iron Formation, within which, the mineralogy is fairly uniform in Keetac's mining area. U. S. Steel plans to continue exclusive deposition of Keetac tailings in the Tailings Basin.

3.0 Geology and Hydrogeology

Keetac's Tailings Basin is located mostly in western St. Louis County, and straddles the border with eastern Itasca County. This area has moderately thick (25 to 200 feet) glacial deposits overlying low-permeability bedrock (Figure 2). Any potential for adverse effects from the project on nearby hydrogeological settings would occur in relatively shallow geologic units.

3.1 Surficial Geology

Tailings deposits in the Exterior Basin range from 5 feet to 25 feet thick. Tailings within the active Interior Basin are generally much thicker. A layer of peat generally 3 feet thick or less underlies tailings in parts of the Tailings Basin (e.g., MWI unique ID 191423) and occurs at the surface sporadically beyond the Exterior Basin (Figure 2).

The Tailings Basin is underlain by 25 feet to more than 300 feet of Quaternary-aged unconsolidated deposits of the Aitkin and Independence Formations, and possibly deeper undifferentiated glacial deposits. Near the Tailings Basin, the uppermost Quaternary-aged unit is typically the Aitkin Formation which is composed locally of the Nelson Lake (Map Units an and anh, Figure 3) and Alborn members (Map

Unit aa, Figure 3). The Nelson Lake Member typically consists of brown, fine-grained loam to clay loam till and was deposited by the southwest arm of the St. Louis sublobe (Johnson et al., 2016; Lusardi et al., 2016). The Alborn Member typically consists of reddish loam to clay loam till originating from the St. Louis sublobe (Johnson et al., 2016; Lusardi et al., 2016). The Independence Formation underlies the Aitkin Formation and typically consists of brown, gray, or red rocky, sandy loam till originating from the Rainy lobe in north-central and northeast Minnesota (Johnson et al., 2016). The Quaternary units present in Minnesota Well Index well logs near the Tailings Basin are a mixture of brown, gray, and occasionally red clay, sand, and gravel layers.

The underlying bedrock is Precambrian-age Thomson Formation slate and possibly the Cretaceous-age Coleraine Formation, which consists of conglomerate, lignite, sandstone, and shale (Jirsa et al., 2011). Two deep wells to the north and west of the Interior Tailing Basin suggest bedrock of Biwabik Iron Formation and Pokegama Quartzite underlie the 200- to 500-foot-thick Thomson Formation.

Six monitoring wells are located in or adjacent to the Tailings Basin. Geologic logs are not available, but approximate well bottom elevations were estimated from well depth measurements and 2-ft topographic contours for Itasca and St. Louis Counties. The calculated well depths were compared with the top of native unconsolidated deposits identified in geologic logs from eight Tailings Basin borings. Peat was reported at elevations of 1459 ft to 1489 ft in five borings and other unconsolidated deposits were identified at 1458 ft to 1529 ft in the remaining three borings. The most likely deposits in which each monitoring well is screened are listed in Table 1.

Table 1 Summary of monitoring well depths

Well	Well depth below top of casing (ft)	Approximate ground surface elevation (ft)	Approximate bottom elevation (ft)	Likely deposits in screened interval
B401B	19.1	1486.0	1466.0	near boundary between tailings and native unconsolidated deposits
C502A	11.6	1491.0	1479.0	near base of tailings
MW-1	23.6	1439.0	1418.4	native unconsolidated deposits
MW-11	37.6	1454.0	1418.9	native unconsolidated deposits
MW-12	13.6	1438.5	1426.7	native unconsolidated deposits
SW Well	32.5	1472.5	1440.0	native unconsolidated deposits

3.2 Hydrogeology

Groundwater likely flows generally radially from the Tailings Basin toward surface water features west, south, and east of the basin. The project is not anticipated to affect groundwater north of the Tailings Basin because tailings will be deposited in the Exterior Basin; groundwater in this area may also be upgradient of the Tailings Basin due to the overall topographic slope to the south. Welcome Creek and West Swan River skirt the Tailings Basin on the west and east sides, respectively (Figure 1). Welcome Creek flows south and west through Reservoir Two North and Reservoir Two, and occasionally into Reservoir Six for use as process makeup water. Discharge from Reservoir 2 flows through the O'Brien Creek diversion

channel and into Hay Creek. The headwaters of Hay Creek occur at the south end of the Exterior Tailings Basin. Welcome Creek and Hay Creek are tributaries to the Swan River, which flows into the Mississippi River. West Swan River flows southward just east of the Tailings Basin, then the east to the St. Louis River.

Hydraulic conductivity was estimated for the fine tailings and underlying Quaternary sand layers based on specific capacity data reported on well logs for wells in the Keetac Tailings Basin area, using the approach published by Bradbury and Rothschild (1985). Their approach uses the Cooper-Jacob approximation of the Theis equation and assumes the aquifer is confined, homogeneous, and isotropic. The approach also assumes that the storage coefficient, well loss, and effective aquifer thickness are known. As these assumptions are not satisfied, the resulting hydraulic conductivity values are approximate estimates. The fine tailings hydraulic conductivity, estimated from one well, is approximately 1 ft/day. The hydraulic conductivity of the sand was estimated to range from 7 ft/day to 25 ft/day, with a geometric mean of 12 ft/day. The sand hydraulic conductivity was estimated using data from four wells located less than 6,000 feet (~1 mile) and one well approximately 10,000 feet (~2 miles) away from the Tailings Basin (Figure B-1). These wells may be installed in the Independence Formation, but the well logs do not contain sufficient information to assign the screened intervals to an aquifer. The locations and well logs for wells with specific capacity data used to estimate hydraulic conductivity are included in Appendix B.

4.0 Groundwater Quality

Available groundwater quality information for wells on the perimeter of the Interior and Exterior Basin was compared with water quality in and directly downstream from the Tailings Basin, and in background groundwater (Lively and Thorleifson, 2009) to evaluate whether the basin perimeter wells display apparent influence from Tailings Basin seepage. The constituents of interest (COI) for comparison of Tailings Basin seepage to background groundwater quality are chloride, sulfate, and total dissolved solids (TDS). In general, Tailings Basin seepage is expected to have higher concentrations of COIs than background groundwater due to their presence in process water. Chloride is a conservative tracer, and better suited to isolating any Tailings Basin seepage influence than the other COIs. Additional water quality parameters have been monitored at some locations (Appendix C, Table C2), but are not discussed in this document.

4.1 Basin Water Quality

Keetac has collected surface water quality samples at the Interior Basin Weir (aka Inner Tailings Basin Decant Tower Weir) five times from 2014 through 2021 (Figure 4). Discharge from the Interior Basin Weir flows through the Stage 2 Pond into Reservoir Six, from which it is pumped to the processing plant as make-up water or can flow north through SD005, then west to Reservoir Two. Discharge from Reservoir Two flows through the O'Brien Creek diversion channel and into Hay Creek. The project will not alter surface discharge routes from the Tailings Basin (Appendix A).

Water quality data were collected at SD005 periodically from 2009 through 2014, then monthly since 2015. Temporal trends in COI concentrations are not apparent in the SD005 data. Samples were also collected in 2014 and 2015 from the tailings slurry, Interior Basin weir, the Stage 2 pond, and the Reservoir

Six Pumphouse (Kelly et al., 2016). Average concentrations of COIs at these locations are shown on Table 2 and supporting data tables are included in Appendix C. Tailings Basin water quality data are not available from other locations.

Table 2 Summary of basin water quality

Location	Chloride (mg/L)			Sulfate (mg/L)			Total Dissolved Solids (mg/L)		
	Standard	--	--	250	--	--	500	--	--
	Average	Standard Deviation	Samples	Average	Standard Deviation	Samples	Average	Standard Deviation	Samples
Tailings Slurry	30.2	2.6	2	135	2.5	2	--	--	--
Interior Basin Weir	30.0	6.0	5	143	25.6	5	489	5.0	2
Stage 2 Pond	22.1	1.0	2	109	2.9	2	--	--	--
Reservoir Six Pumphouse	24.5	4.0	3	112	14.7	3	--	--	--
SD005	24.8	0.0	2	101	19.2	90	503	--	1

-- No data available

Interior Basin discharge meets applicable standards for the COIs; however, TDS is very close to the sMCL at the Interior Basin weir and slightly exceeds the sMCL in the single sample from SD005. Interior Basin water quality provides an analog for Exterior Basin water quality during and following the Phase 1 project because the tailings quality is not expected to change as indicated in Section 2.3.

4.2 Background Groundwater Quality

Regional groundwater quality data have been compiled by the Minnesota Pollution Control Agency (MPCA, 1999) and later by the Minnesota Geological Survey (Lively and Thorleifson, 2009). Most domestic wells located near the Tailings Basin are screened in a Quaternary-age buried artesian aquifer (QBAA), likely sandier intervals of the Independence Formation (Figure 3). However, some domestic wells are screened in a Quaternary-age water table aquifer (QWTA) or bedrock, or the screened interval is unknown. Average groundwater quality data from wells screened in Quaternary-age aquifers within 50 miles of the Tailings Basin are presented in Table 3.

Table 3 Summary of regional groundwater quality¹

Aquifer	Chloride (mg/L)			Sulfate (mg/L)			Total Dissolved Solids (mg/L)		
	Standard	230	--	--	250	--	--	500	--
	Average	Standard Deviation	Wells	Average	Standard Deviation	Wells	Average	Standard Deviation	Wells
Surficial Drift (QWTA)	6.0	6.9	9	9.8	8.2	9	229	83	9
Buried Unconfined Drift (QBUU)	3.4	6.0	8	4.3	4.7	8	235	121	8
Buried Artesian Drift (QBAA)	3.1	4.5	21	6.5	4.6	21	244	85	21

¹ All values calculated from data at individual wells reported in Lively and Thorleifson (2009).

4.3 Water Quality Comparison

Groundwater quality samples were collected at three monitoring wells (MW 1, MW 11, and MW 12, Figure 4) near the southwest corner of the Exterior Basin in 2014 (Kelly et al., 2016). Keetac sampled wells near the perimeter of the Interior Basin in fall 2021 (SW Well, B401B, and C502A). The SW Well was dry; however, two sets of samples were collected from B401B and C502A (Figure 4). The screened intervals of the monitoring wells are unknown. However, as noted in Table 1, B401B and C502A are likely screened near or just below the bottom of tailings, while the remaining wells are very likely screened in native unconsolidated deposits. Average water quality data for the wells are presented in Table 4.

Table 4 Groundwater quality at site wells

Location	Chloride (mg/L)			Sulfate (mg/L)			Total Dissolved Solids (mg/L)		
	Standard	230	--	--	250	--	--	500	--
	Average	Standard Deviation	Samples	Average	Standard Deviation	Samples	Average	Standard Deviation	Samples
B401B	24.3	0.3	2	167	1.5	2	523	23	2
C502A	23.5	0.2	2	75.7	1.5	2	497	41	2
MW 1	23.6	0.3	2	54.9	11.1	2	--	--	--
MW 11	23.3	--	1	93.1	--	1	--	--	--
MW 12	17.2	--	1	57.4	--	1	--	--	--

Chloride and sulfate are below applicable standards in the sampled wells. TDS is slightly above the sMCL at B401B and very close to the sMCL at C502A, which are both at the toe of the Interior Basin. Sulfate in groundwater is similar to or slightly lower than sulfate in Tailings Basin surface water, indicating that

sulfate generated from the oxidation of coarse tailings in the perimeter dikes is mostly attenuated by sulfate reduction in or adjacent to the Tailings Basin. This assessment is supported by a MnDNR study, which concluded that sulfate in Keetac's Tailings Basin seepage is likely reduced by microbial activity (Kelly et al., 2016).

Concentrations of COIs in groundwater near the Tailings Basin are elevated relative to regional groundwater. Water quality at the wells is very similar to Interior Basin surface discharge water quality for chloride, sulfate, and TDS, though sulfate is lower in some groundwater samples. With the Phase 1 project, future groundwater quality at the edge of the Exterior Basin is expected to be very similar to the currently-observed water quality at B401B and C502A. Overall, wells near the perimeters of the Interior Basin and Exterior Basin meet applicable standards for chloride and sulfate, and slightly exceed the sMCL for TDS. The sampled locations are expected to represent worst-case water quality conditions due to their proximity to the Tailings Basin; more distant locations would have lower concentrations of the COIs due to dilution and sulfate reduction.

5.0 Conclusions

This analysis concludes that hydrogeologic units near the Tailing Basin are capable of supporting drinking water wells as evidenced by the numerous domestic wells located within 2 miles east of the Tailings Basin (Figure 3). However, the West Swan River likely acts as a hydrologic barrier to eastward shallow groundwater flow, preventing potential lateral migration of groundwater to all but two domestic wells downgradient of the Tailings Basin on the east side. Domestic wells downgradient of the Tailings Basin to the south and west are more than 3 miles away and more than 2.4 miles away, respectively. Keetac property ownership extends more than 1 mile and more than 2.3 miles beyond the Exterior Basin to the west and south, respectively, preventing new well installation in those areas. In addition, most of the domestic wells near the Tailings Basin are screened in the Independence Formation, which is generally overlain by clay from the Aitkin Formation and/or peat. The continuity and thickness of the Aitkin Formation under the Tailings Basin are unknown.

Surface water quality from the Interior Basin and groundwater quality from the perimeter of the Interior and Exterior Basins meet applicable standards for chloride and sulfate. TDS is slightly higher in groundwater near the toe of the active Interior Tailings Basin than in the recirculating process water, but remains close to the sMCL. For the following reasons, it is reasonable to anticipate "no significant adverse effect on groundwater quality" at wells located farther from the Tailings Basin as a result of Keetac's proposed Phase 1 project:

- Interior Basin water quality provides a direct analog for Exterior Basin water quality and COI concentrations are either below or slightly above applicable standards
- Groundwater concentrations immediately adjacent to the Tailings Basin are currently either below or just above applicable standards

To: Tom Moe and Darren Gietzen
From: Barr Engineering Co.
Subject: Keetac Tailings Basin Expansion Groundwater Sensitivity Assessment
Date: April 8, 2022
Page: 9

- Concentrations would be expected to decrease downgradient due to the influence of recharge and other attenuation mechanisms (e.g., dilution, sulfate reduction).

6.0 References

- Barr Engineering Co. (Barr), 2012. 2011 Water Quality, Hydrology, and Wild Rice Monitoring Year End Report - Swan Lake, Hay Lake, Moose Lake, Hay Creek, and Swan River. Prepared for United States Steel Corporation, Minnesota Ore Operations – Keetac, January 2012.
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https://www.dnr.state.mn.us/lands_minerals/dnr_so4_research.html
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Attachments

Figure 1 Project Location

Figure 2 Depth to Bedrock

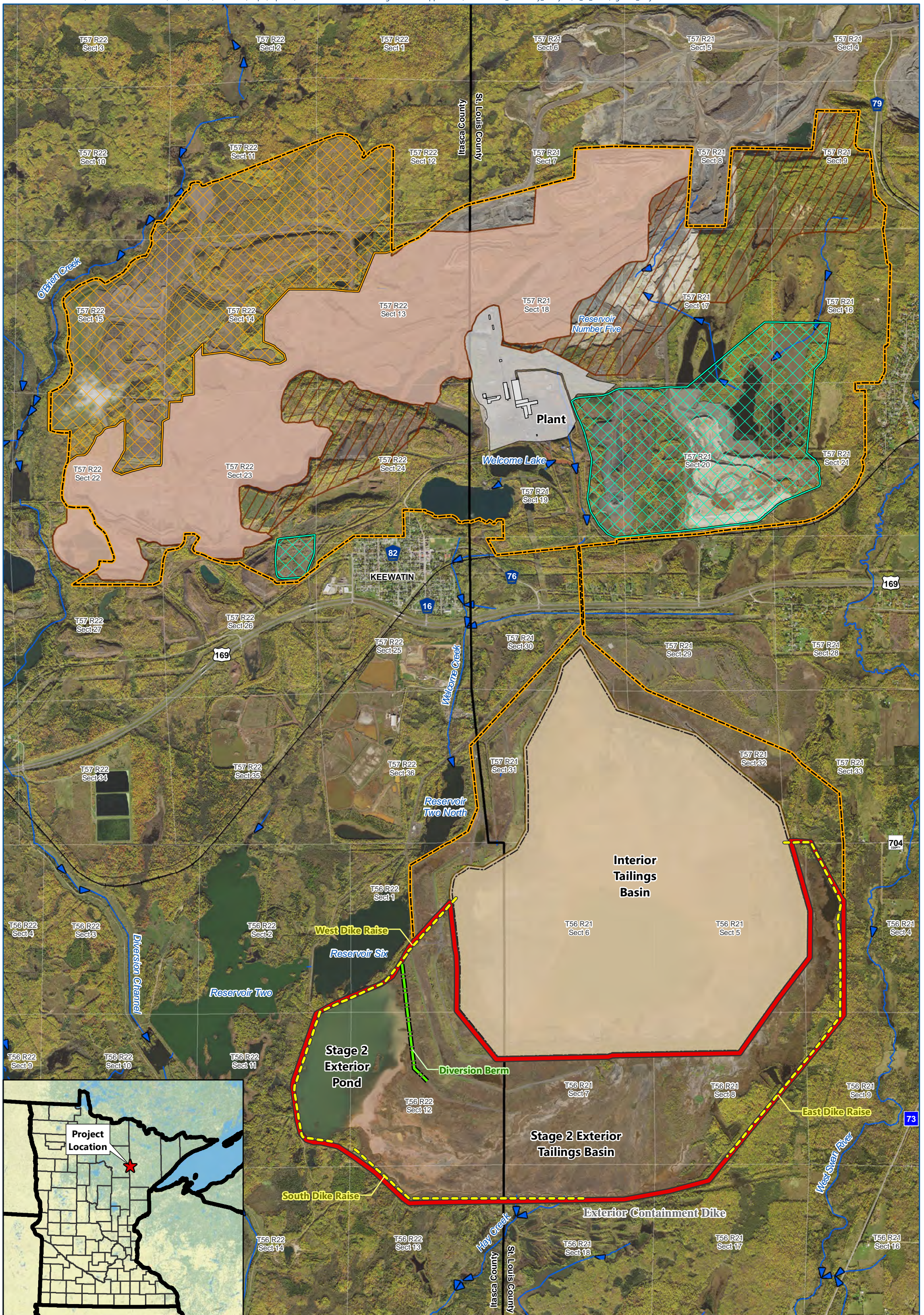
Figure 3 Minnesota Well Index and Surficial Geology

Figure 4 Water Quality Monitoring Locations

Appendix A Tailings Discharge Schematic

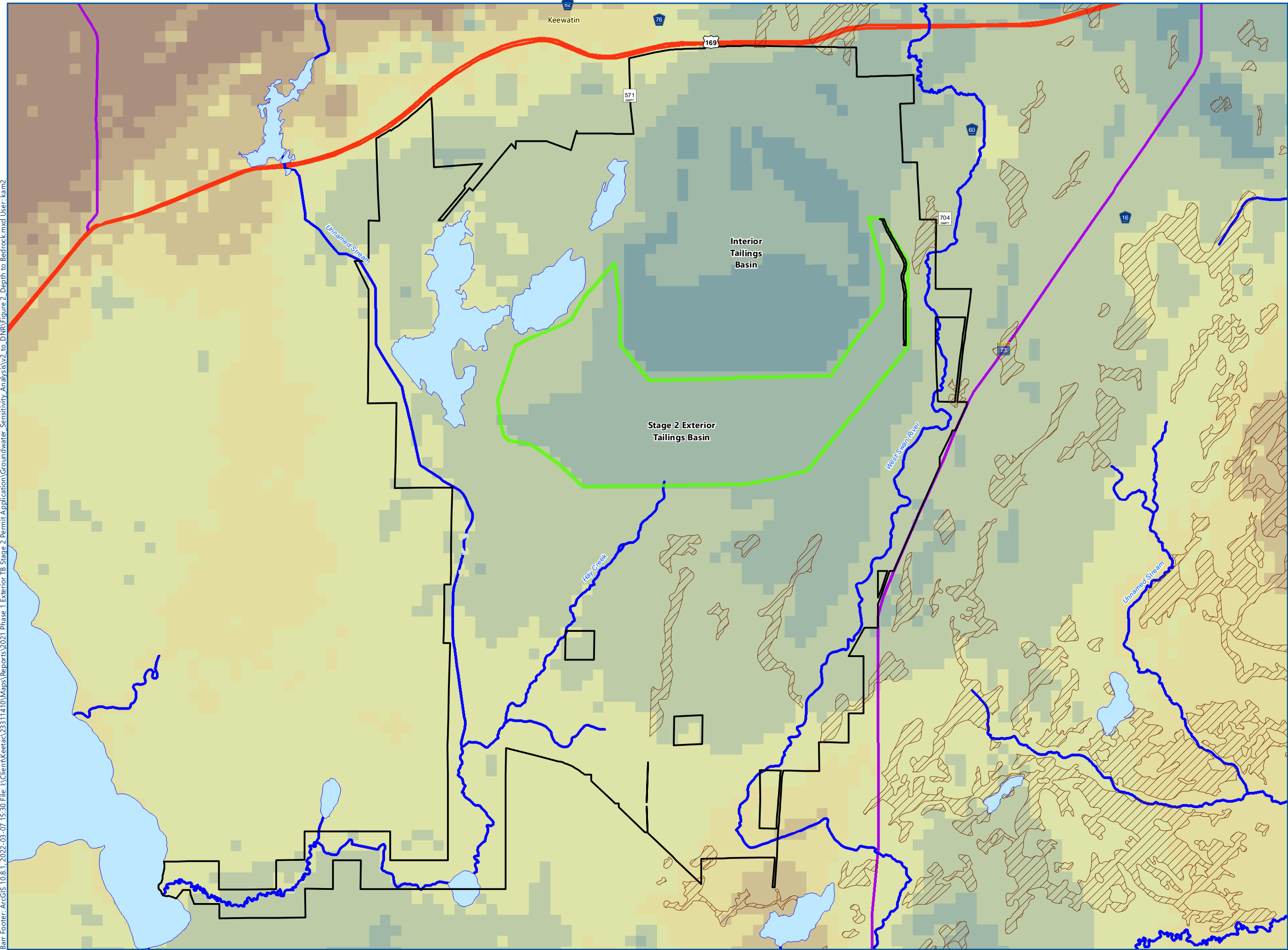
Appendix B Hydraulic Conductivity Estimate Source Information














Appendix C Water Quality Data Summarized in Tables 2, 3, and 4



PROJECT LOCATION
Keetac Tailings
Basin Management
U. S. Steel - Keetac

FIGURE 1



-  Public Watercourse
-  Public Waters Basins
-  Stage 2 Exterior Tailings Basin
-  U. S. Steel Property
-  peat (SSURGO, 2012)
- Depth to Bedrock (50 ft. interval)
 -  0 - 50
 -  51 - 100
 -  101 - 150
 -  151 - 200
 -  201 - 250
 -  251 - 300
 -  301 - 350
 -  351 - 400

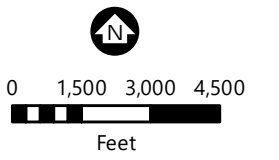


Image Source: FSA (2021)

Depth to Bedrock
Keetac Tailings
Basin Management
U. S. Steel - Keetac
FIGURE 2

Barr Footer: ArcGIS 10.8.1, 2022-03-08 17:35:00; I:\Client\Keetac\23311410\psa\Reports\2021 Phase 1 Exterior Tails\Figure 3 - MN Well Index and Surficial Geology.v3.mxd User: lam2

D-1 Surficial Geology (MGS)* Formation/Member

Aitkin/Alborn

- aa: Clay loam over sand and gravel
- aa: Clay loam to loam
- aa: Till; washed
- aah: Mixed deposits, predominantly till
- aah: Till, silt and clay, sand, and gravel
- aii: Sand, gravelly sand, and gravel
- glf: Glacial lake sediment; modified by currents (subaqueous outwash)
- glg: Sand and gravelly sand
- glg: Sand and silty sand
- gls: Sand and silt

Aitkin/Nelson Lake

- aii: Ice contact deposits
- an: Till over Rainy lobe deposits
- an: Till; washed; over Rainy lobe deposits
- anh: Complex of till and Rainy-lobe ice contact deposits
- anh: Mixed deposits, predominantly till

Independence/Undifferentiated

- ini: Ice contact deposits

Boundary Waters/Undifferentiated

- bw: Till

Unspecified

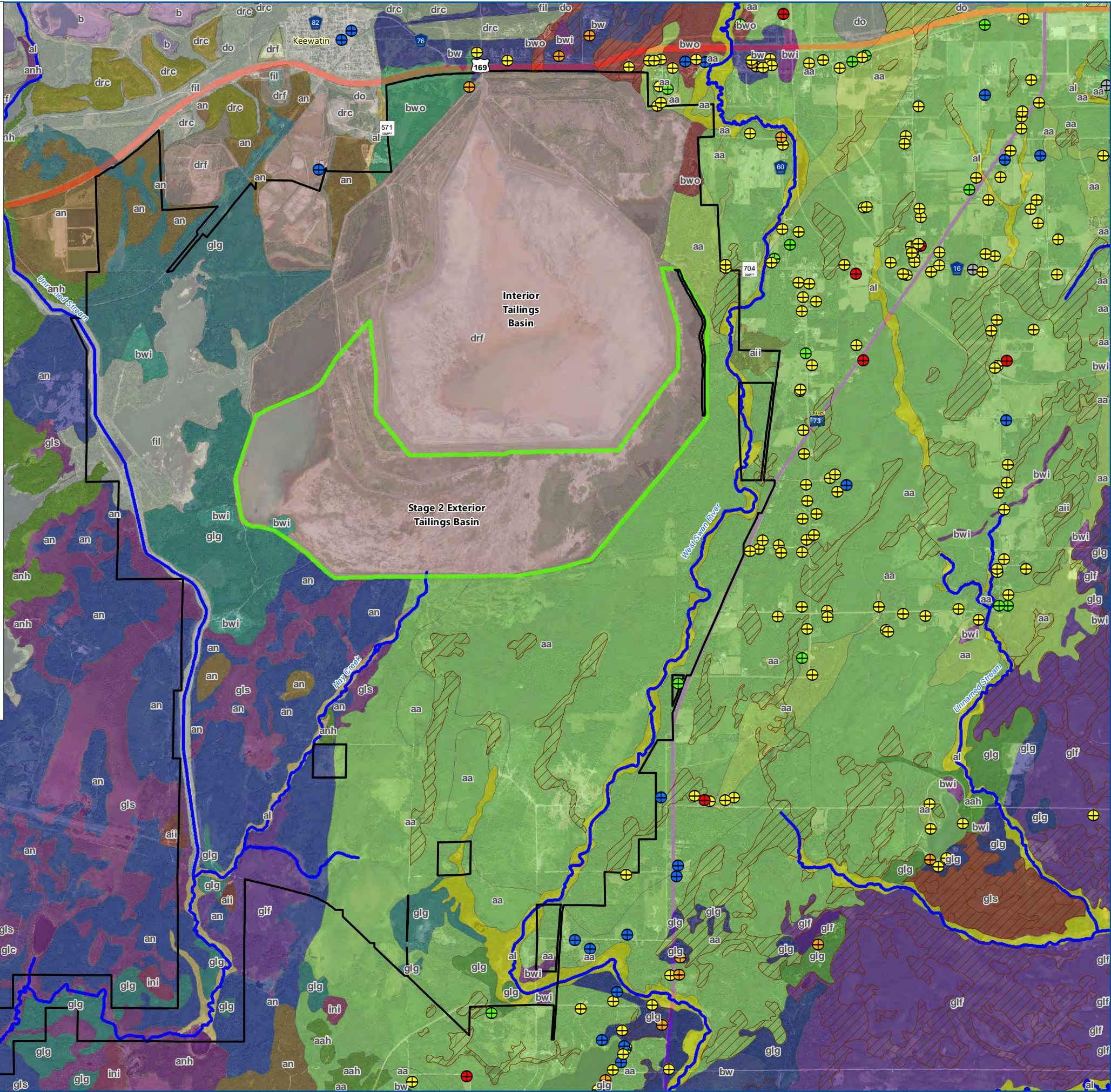
- al: Alluvium
- al: Sand and gravel, sandy loam to silt loam
- glc: Glacial lake sediment
- glg: Deltaic sediment
- glg: Glacial lake sediment; coarse-grained
- gls: Glacial lake sediment; sandy

Not Applicable

- b: Mine-pit-lake
- do: Overburden dump mound
- drc: Coarse-grained rock dump mound
- drc: Dump mound of unknown extent
- drc: Medium-grained rock dump mound
- drc: Overburden dump mound
- drc: Rock dump mound
- drf: Dump mound of unknown extent
- drf: Fine-grained rock tailings basins
- fil: Constructed land
- fil: Disturbed land
- fil: Dump mound of unknown extent

peat (SSURGO, 2012)

- bwi: Cobbles and gravel, sandy gravel, and gravelly sand
- bwi: Ice contact deposits
- bwo: Outwash
- bwo: Sand to gravelly sand



Active Wells by Aquifer

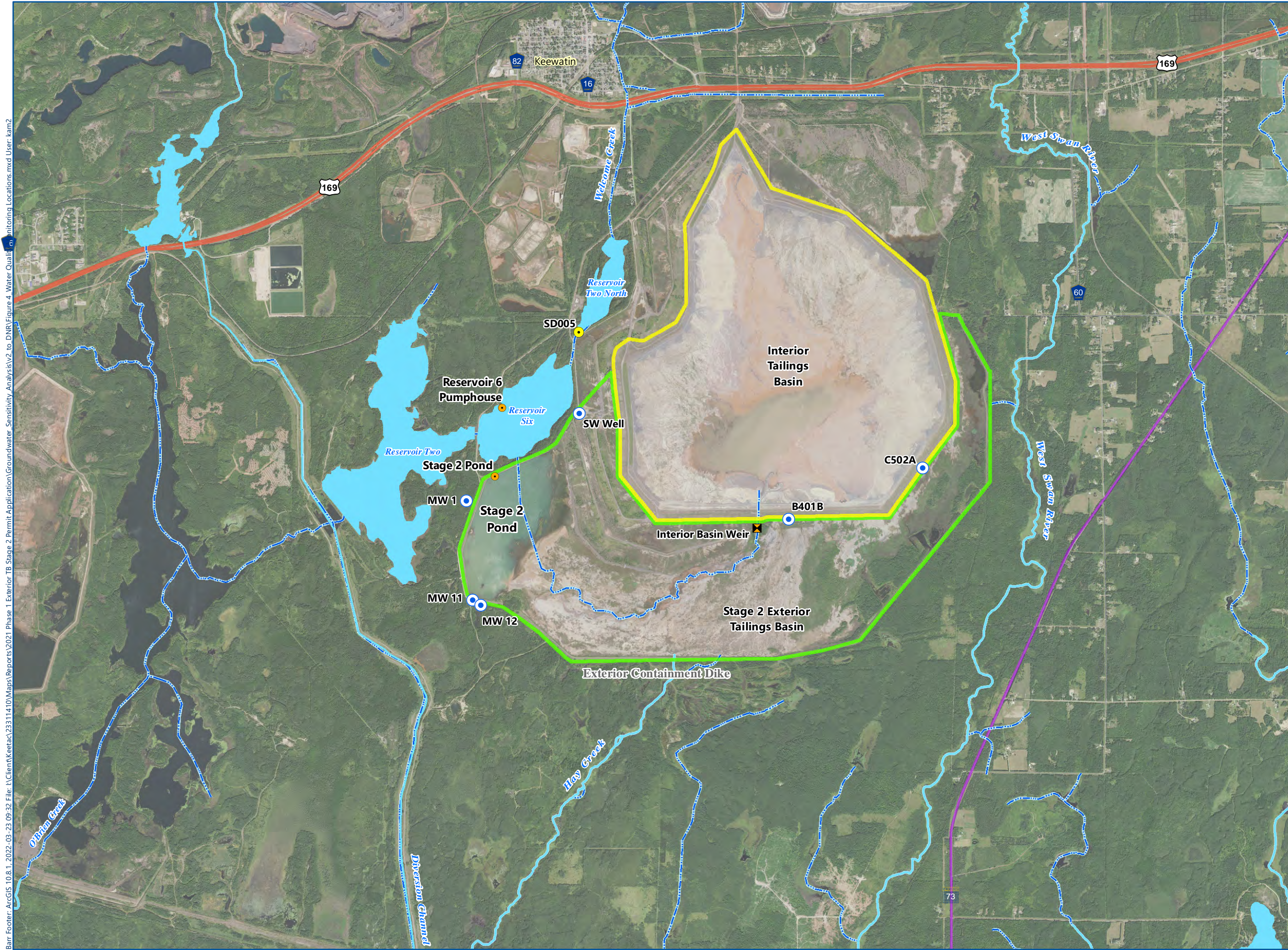
- ⊕ Not Available
- ⊕ Bedrock
- ⊕ QBAA
- ⊕ QBUA
- ⊕ QUUU
- ⊕ QWTA

- Public Watercourse
- Interior Tailings Basin
- Stage 2 Exterior Tailings Basin
- U. S. Steel Property

*This surficial geology map is the Minnesota Geological Survey's D-1 Surficial Geology, a database that is continuously updated. The original D-1 Surficial Geology started with the S-23 Geologic Map of Minnesota - Quaternary Geology but the data has now been updated to the D-1 Surficial Geology. The D-1 Surficial geology is a product of compiled and edge matched mapping from 1:100,000 scale MGS Quaternary maps. Downloaded 5/28/2020

0 1,500 3,000 4,500
Feet
Image Source: FSA (2019)

Minnesota Well Index and Surficial Geology
Keetac Tailings Basin Management
U. S. Steel - Keetac
FIGURE 3



- Monitoring Well
- Weir
- Surface Sampling Location
- Discharge Location
- NHD
- PWI Watercourse
- PWI Basin
- Interior Tailings Basin
- Stage 2 Exterior Tailings Basin

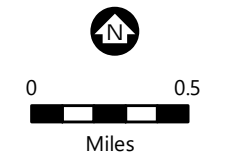


Image Source: FSA (2021)

Water Quality Monitoring Locations
Keetac Tailings Basin Management
U. S. Steel - Keetac
FIGURE 4







Appendix A

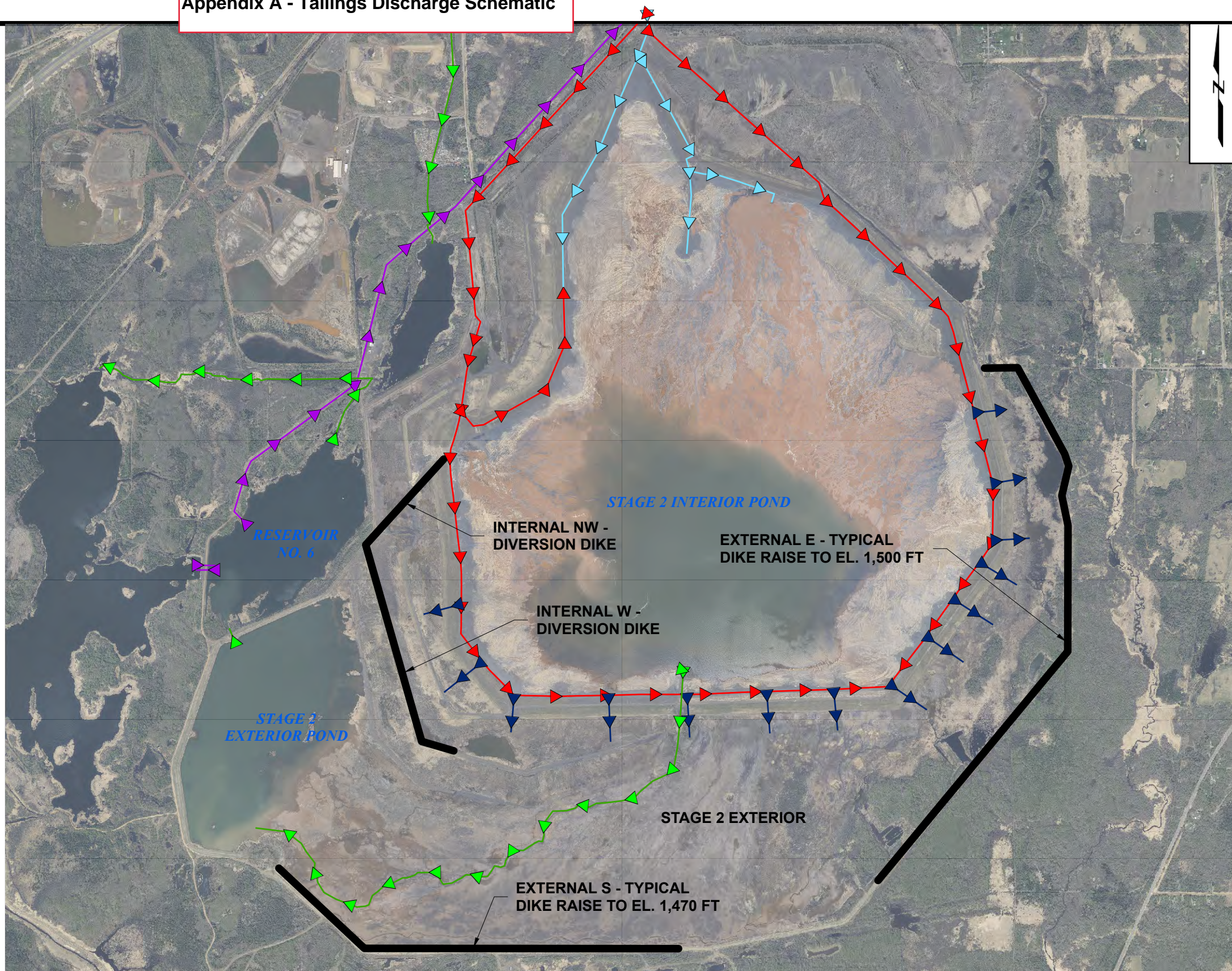
Tailings Discharge Schematic

Appendix A - Tailings Discharge Schematic

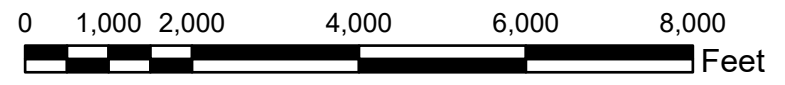
LEGEND:


Discharge Schematic

-  Gravity / Natural Drainage
-  Normal Tailings Line
-  Pumping Flow
-  Potential Short Term Tailings Discharge Line
-  Standby Tailings Line
-  2022 Construction Area



Spatial Reference
Name: NAD 1983 2011 StatePlane Minnesota North FIPS 2201 Ft US

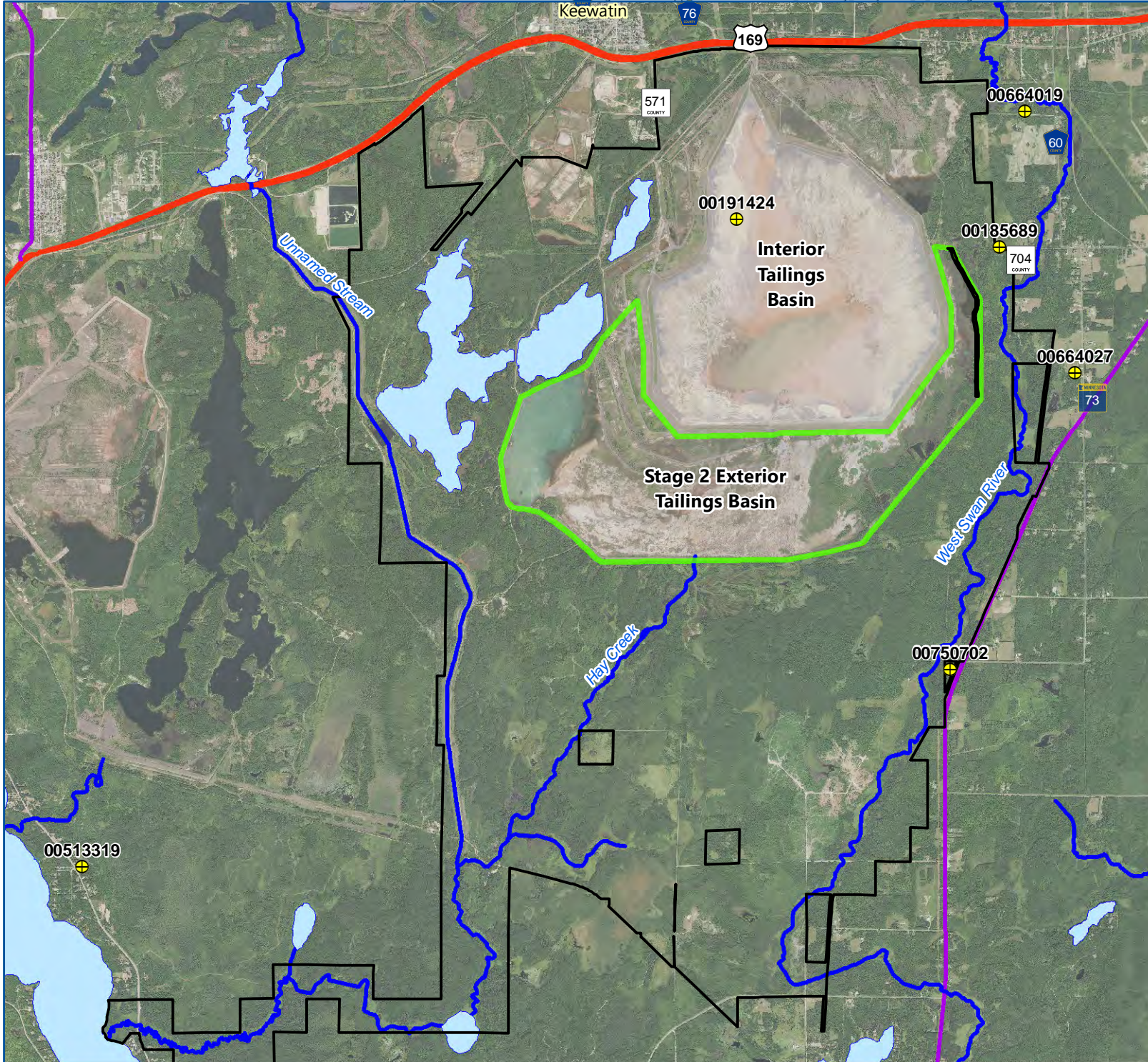


Permit to Mine Non-Substantial Amendment Keetac Tailings Basin Keewatin, Minnesota		NEAR TERM DISCHARGE SCHEMATIC
United States Steel Corp. Keewatin, Minnesota	Project 2100305	January 2022 Fig. 3

Path: C:\Users\jhanse\OneDrive - GEI Consultants, Inc\Documents\GIS_Work\KEETAC\2100305_Keetac_2021 Quarterly Tailings Basin PM\2100305_Keetac_2021 Quarterly Tailings Basin PM.aprx

Appendix B

Hydraulic Conductivity Estimate Source Information



- Well - County Well Index
- Public Watercourse
- Public Waters Basins
- Stage 2 Exterior Tailings Basin
- U. S. Steel Property

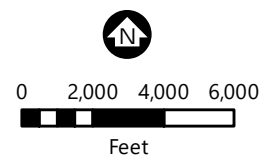


Image Source: FSA (2021)

Wells with Specific Capacity Data
Keetac Tailings Basin Management
U. S. Steel - Keetac
FIGURE B-1

185689

County St. Louis
 Quad Silica
 Quad ID 295D

MINNESOTA DEPARTMENT OF HEALTH
WELL AND BORING REPORT
 Minnesota Statutes Chapter 1031

Entry Date 09/10/1990
 Update Date 07/01/2015
 Received Date

Well Name WKKQ	Township 57	Range 21	Dir Section W 33	Subsection DCCCC	Well Depth 97 ft.	Depth Completed 97 ft.	Date Well Completed 04/02/1982
Elevation 1466	Elev. Method 7.5 minute topographic map (+/- 5 feet)				Drill Method Non-specified Rotary	Drill Fluid	
Address Well HIBBING MN 55746					Use domestic	Status Active	
Stratigraphy Information					Well Hydrofractured? Yes <input type="checkbox"/> No <input type="checkbox"/>	From	To
Geological Material From To (ft.) Color Hardness					Casing Type Single casing Joint Threaded		
CLAY 0 11 BROWN HARD					Drive Shoe? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
COBBLES 11 59 BROWN HARD					Above/Below 4 ft.		
CLAY 59 91 BROWN HARD					Casing Diameter 4 in. To 93 ft. Weight 14.9 lbs./ft. Hole Diameter 6.5 in. To 97 ft.		
SAND 91 97 BROWN MEDIUM					Open Hole From ft. To ft.		
					Screen? <input checked="" type="checkbox"/> Type stainless Make JOHNSON		
					Diameter 3 in. Slot/Gauze 15 Length 4 ft. Set 93 ft. 97 ft.		
					Static Water Level 30 ft. land surface Measure 04/02/1982		
					Pumping Level (below land surface) 85 ft. 1 hrs. Pumping at 20 g.p.m.		
					Wellhead Completion Pitless adapter manufacturer Model		
					<input type="checkbox"/> Casing Protection <input checked="" type="checkbox"/> 12 in. above grade		
					<input type="checkbox"/> At-grade (Environmental Wells and Borings ONLY)		
					Grouting Information Well Grouted? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Specified		
					Nearest Known Source of Contamination 85 feet South Direction Septic tank/drain field Type		
					Well disinfected upon completion? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
					Pump <input type="checkbox"/> Not Installed Date Installed		
					Manufacturer's name		
					Model Number HP Volt		
					Length of drop pipe ft Capacity g.p. Typ		
					Abandoned Does property have any not in use and not sealed well(s)? <input type="checkbox"/> Yes <input type="checkbox"/> No		
					Variance Was a variance granted from the MDH for this well? <input type="checkbox"/> Yes <input type="checkbox"/> No		
					Miscellaneous First Bedrock Aquifer Quat. buried		
					Last Strat sand-brown Depth to Bedrock ft		
					Located by Minnesota Geological Survey		
					Locate Method Digitized - scale 1:24,000 or larger (Digitizing Table)		
					System UTM - NAD83, Zone 15, Meters X 498925 Y 5246466		
					Unique Number Verification Information from Input Date 07/26/1993		
					Angled Drill Hole		
					Well Contractor Arrowhead Well 69518 BEUNING, W. Licensee Business Lic. or Reg. No. Name of Driller		

Remarks

MINNESOTA DEPARTMENT OF HEALTH
WELL AND BORING REPORT
Minnesota Statutes Chapter 1031

Entry Date 05/20/1991

Update Date 10/16/2018

Received Date

County St. Louis
 Quad Silica
 Quad ID 295D

191424

<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td>Well Name</td> <td>Township</td> <td>Range</td> <td>Dir Section</td> <td>Subsection</td> </tr> <tr> <td>USGS KTB 32</td> <td>57</td> <td>21</td> <td>W 31</td> <td>DCBBBB</td> </tr> <tr> <td>Elevation</td> <td>1495.4</td> <td>Elev. Method</td> <td colspan="2">Surveyed</td> </tr> <tr> <td colspan="5">Address</td> </tr> <tr> <td colspan="5">Stratigraphy Information</td> </tr> <tr> <td>Geological Material</td> <td>From</td> <td>To (ft.)</td> <td>Color</td> <td>Hardness</td> </tr> <tr> <td>TAILINGS V. FINE</td> <td>0</td> <td>17</td> <td>GRAY</td> <td></td> </tr> </table>	Well Name	Township	Range	Dir Section	Subsection	USGS KTB 32	57	21	W 31	DCBBBB	Elevation	1495.4	Elev. Method	Surveyed		Address					Stratigraphy Information					Geological Material	From	To (ft.)	Color	Hardness	TAILINGS V. FINE	0	17	GRAY		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td>Well Depth</td> <td>Depth Completed</td> <td>Date Well Completed</td> </tr> <tr> <td>17 ft.</td> <td>17 ft.</td> <td>09/22/1982</td> </tr> <tr> <td>Drill Method</td> <td colspan="2">Drill Fluid</td> </tr> <tr> <td>Use test well</td> <td>Status</td> <td>Sealed</td> </tr> <tr> <td>Well Hydrofractured?</td> <td>Yes <input type="checkbox"/></td> <td>No <input type="checkbox"/> From To</td> </tr> <tr> <td>Casing Type</td> <td>Single casing</td> <td>Joint</td> </tr> <tr> <td>Drive Shoe?</td> <td>Yes <input type="checkbox"/></td> <td>No <input type="checkbox"/> Above/Below</td> </tr> <tr> <td>Casing Diameter</td> <td>Weight</td> <td>Hole Diameter</td> </tr> <tr> <td>5 in. To 7 ft. 2.25 lbs./ft.</td> <td></td> <td>8 in. To 16 ft.</td> </tr> <tr> <td>Open Hole</td> <td>From ft.</td> <td>To ft.</td> </tr> <tr> <td>Screen? <input checked="" type="checkbox"/></td> <td>Type plastic</td> <td>Make</td> </tr> <tr> <td>Diameter Slot/Gauze Length Set</td> <td></td> <td></td> </tr> <tr> <td>5 in. 10 10 ft. 6 ft. 16 ft.</td> <td></td> <td></td> </tr> <tr> <td>Static Water Level</td> <td>4.5 ft. land surface</td> <td>Measure 11/01/1982</td> </tr> <tr> <td>Pumping Level (below land surface)</td> <td>15 ft. 1 hrs. Pumping at</td> <td>0.75 g.p.m.</td> </tr> <tr> <td>Wellhead Completion</td> <td>Pitless adapter manufacturer</td> <td>Model</td> </tr> <tr> <td><input type="checkbox"/> Casing Protection</td> <td><input checked="" type="checkbox"/> 12 in. above grade</td> <td></td> </tr> <tr> <td colspan="3"><input type="checkbox"/> At-grade (Environmental Wells and Borings ONLY)</td> </tr> <tr> <td>Grouting Information</td> <td>Well Grouted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Specified</td> <td></td> </tr> <tr> <td>Material Amount From To</td> <td></td> <td></td> </tr> <tr> <td>bentonite</td> <td></td> <td>ft. ft.</td> </tr> <tr> <td>Nearest Known Source of Contamination</td> <td>feet Direction</td> <td>Type</td> </tr> <tr> <td>Well disinfected upon completion?</td> <td><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</td> <td></td> </tr> <tr> <td>Pump <input type="checkbox"/> Not Installed</td> <td>Date Installed</td> <td></td> </tr> <tr> <td>Manufacturer's name</td> <td></td> <td></td> </tr> <tr> <td>Model Number HP Volt</td> <td></td> <td></td> </tr> <tr> <td>Length of drop pipe ft Capacity g.p. 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No. Name of Driller</td> <td></td> <td></td> </tr> </table>	Well Depth	Depth Completed	Date Well Completed	17 ft.	17 ft.	09/22/1982	Drill Method	Drill Fluid		Use test well	Status	Sealed	Well Hydrofractured?	Yes <input type="checkbox"/>	No <input type="checkbox"/> From To	Casing Type	Single casing	Joint	Drive Shoe?	Yes <input type="checkbox"/>	No <input type="checkbox"/> Above/Below	Casing Diameter	Weight	Hole Diameter	5 in. To 7 ft. 2.25 lbs./ft.		8 in. To 16 ft.	Open Hole	From ft.	To ft.	Screen? <input checked="" type="checkbox"/>	Type plastic	Make	Diameter Slot/Gauze Length Set			5 in. 10 10 ft. 6 ft. 16 ft.			Static Water Level	4.5 ft. land surface	Measure 11/01/1982	Pumping Level (below land surface)	15 ft. 1 hrs. Pumping at	0.75 g.p.m.	Wellhead Completion	Pitless adapter manufacturer	Model	<input type="checkbox"/> Casing Protection	<input checked="" type="checkbox"/> 12 in. above grade		<input type="checkbox"/> At-grade (Environmental Wells and Borings ONLY)			Grouting Information	Well Grouted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Specified		Material Amount From To			bentonite		ft. ft.	Nearest Known Source of Contamination	feet Direction	Type	Well disinfected upon completion?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Pump <input type="checkbox"/> Not Installed	Date Installed		Manufacturer's name			Model Number HP Volt			Length of drop pipe ft Capacity g.p. 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Remarks
 SEALED 12-26-1991 BY M0113.
 DRILLED BY BENES WELL DRILLING FOR THE USGS.

513319County Itasca
Quad Pengilly
Quad ID 295CMINNESOTA DEPARTMENT OF HEALTH
WELL AND BORING REPORT
Minnesota Statutes Chapter 1031Entry Date 12/31/1992
Update Date 05/19/2014
Received Date

Well Name FREDENBURG,	Township 56	Range 22	Dir Section W 29	Subsection DACCCD	Well Depth 111 ft.	Depth Completed 111 ft.	Date Well Completed 08/05/1992
Elevation 1368	Elev. Method 7.5 minute topographic map (+/- 5 feet)	Drill Method Non-specified Rotary		Drill Fluid Bentonite	Use domestic Status Active		
Address Contact HC 1 BOX 966 PENGILLY MN 55775					Well Hydrofractured? Yes <input type="checkbox"/> No <input type="checkbox"/> From To		
Stratigraphy Information					Casing Type Single casing Joint		
Geological Material	From	To (ft.)	Color	Hardness	Drive Shoe? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Above/Below		
TOP SOIL	0	1	BLACK	SOFT	Casing Diameter Weight Hole Diameter		
SAND	1	5	BROWN	SOFT	4 in. To	107 ft. lbs./ft.	8 in. To 111 ft.
CLAY SAND	5	17	BROWN	SOFT	Open Hole From ft. To ft.		
CLAY SAND	17	57	BLUE	SOFT	Screen? <input checked="" type="checkbox"/> Type stainless Make WESCO		
CLAY	57	92	BLUE	SOFT	Diameter	Slot/Gauze	Length
CLAY SAND	92	106	BLUE	SOFT	4 in.	7	4 ft.
AQUIFER	106	111	WHITE	SOFT			107 ft. 111 ft.
Static Water Level					2.5 ft. land surface Measure 08/05/1992		
Pumping Level (below land surface)					105 ft. 2 hrs. Pumping at 50 g.p.m.		
Wellhead Completion					Pitless adapter manufacturer MONITOR Model SNAPPY		
<input type="checkbox"/> Casing Protection					<input checked="" type="checkbox"/> 12 in. above grade		
<input type="checkbox"/> At-grade (Environmental Wells and Borings ONLY)							
Grouting Information					Well Grouted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Specified		
Material					Amount	From	To
neat cement						10 ft.	30 ft.
Nearest Known Source of Contamination					75 feet North Direction Septic tank/drain field Type		
Well disinfected upon completion?					<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Pump					<input type="checkbox"/> Not Installed Date Installed 08/20/1992		
Manufacturer's name					AERMOTOR		
Model Number					SD12-50	HP	0.5
Length of drop pipe					40 ft	Capacity	12 g.p.
Typ					Submersible		
Abandoned					Does property have any not in use and not sealed well(s)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Variance					Was a variance granted from the MDH for this well? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Miscellaneous					First Bedrock Aquifer Quat. buried		
Last Strat sand-white					Depth to Bedrock ft		
Located by					Minnesota Geological Survey		
Locate Method					Digitized - scale 1:24,000 or larger (Digitizing Table)		
System					UTM - NAD83, Zone 15, Meters	X	487889 Y 5239015
Unique Number Verification					Tag on well	Input Date	01/13/2000
Angled Drill Hole							
Well Contractor					Benes Well Co. 31009 BENES		
Licensee Business					Lic. or Reg. No.	Name of Driller	
Remarks					ROADSIDE ACRES LOT 1.		
Minnesota Well Index Report					513319		
					Printed on 09/07/2021 HE-01205-15		

664019County St. Louis
Quad Keewatin
Quad ID 295AMINNESOTA DEPARTMENT OF HEALTH
WELL AND BORING REPORT
Minnesota Statutes Chapter 1031Entry Date 06/19/2002
Update Date 02/13/2017
Received Date 02/01/2002

Well Name BRAY,	Township 57	Range 21	Dir Section W 28	Subsection DDCCBD	Well Depth 71 ft.	Depth Completed 71 ft.	Date Well Completed 09/01/2002
Elevation 1515	Elev. Method LiDAR 1m DEM (MNDNR)				Drill Method Driven	Drill Fluid Bentonite	
Address					Use domestic	Status Active	
Contact P.O. BOX 462 DASSEL MN 55325					Well Hydrofractured? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> From To		
Well 12545 PELTO RD HIBBING 55746					Casing Type Single casing Joint Solvent Welded		
Stratigraphy Information					Drive Shoe? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Above/Below		
Geological Material	From	To (ft.)	Color	Hardness	Casing Diameter Weight Hole Diameter		
CLAY	0	2	TAN	SOFT	4 in. To	63 ft. lbs./ft.	8 in. To 20 ft.
GRAVELY CLAY	2	46	VARIED	HARD	6.5 in. To 71 ft.		
GRAVEL	46	50	VARIED	HARD			
CLAY	50	61	BROWN	SOFT			
SAND	62	71	BROWN	SOFT			
					Open Hole From ft. To ft.		
					Screen? <input checked="" type="checkbox"/> Type stainless Make COOK		
					Diameter Slot/Gauze Length Set		
					4 in. 8 ft. 63 ft. 71 ft.		
					Static Water Level		
					20 ft. land surface Measure 09/01/2002		
					Pumping Level (below land surface)		
					50 ft. 2 hrs. Pumping at 30 g.p.m.		
					Wellhead Completion		
					Pitless adapter manufacturer SNAPPY Model 4C-1		
					<input type="checkbox"/> Casing Protection <input checked="" type="checkbox"/> 12 in. above grade		
					<input type="checkbox"/> At-grade (Environmental Wells and Borings ONLY)		
					Grouting Information Well Grouted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Specified		
					Material Amount From To		
					high solids bentonite 3 Sacks 0 ft. 30 ft.		
					Nearest Known Source of Contamination		
					feet Direction Type		
					Well disinfected upon completion? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
					Pump <input type="checkbox"/> Not Installed Date Installed 09/07/2001		
					Manufacturer's name AERMOTOR		
					Model Number S12-50 HP 0.5 Volt 230		
					Length of drop pipe 50 ft Capacity 12 g.p. Typ Submersible		
					Abandoned		
					Does property have any not in use and not sealed well(s)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
					Variance		
					Was a variance granted from the MDH for this well? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
					Miscellaneous		
					First Bedrock Aquifer Quat. buried		
					Last Strat sand-brown Depth to Bedrock ft		
					Located by Minnesota Geological Survey		
					Locate Method GPS SA Off (averaged) (15 meters)		
					System UTM - NAD83, Zone 15, Meters X 499228 Y 5248100		
					Unique Number Verification Tax Records Input Date 02/01/2017		
					Angled Drill Hole		
					Well Contractor		
					Mark's Well & Pump 69603 SWADER, M.		
					Licensee Business Lic. or Reg. No. Name of Driller		

664027

County St. Louis
 Quad Silica
 Quad ID 295D

MINNESOTA DEPARTMENT OF HEALTH
WELL AND BORING REPORT
 Minnesota Statutes Chapter 1031

Entry Date 06/27/2002
 Update Date 10/09/2019
 Received Date

Well Name OLSON, LONNIE	Township 56	Range 21	Dir Section W 4	Subsection DDADBC	Well Depth 112 ft.	Depth Completed 106 ft.	Date Well Completed 10/20/2001
Elevation 1475	Elev. Method LiDAR 1m DEM (MNDNR)	Drill Method Non-specified Rotary		Drill Fluid Bentonite			
Address Well LEIGHTON RD N HIBBING MN 55746					Use domestic	Status Active	
Stratigraphy Information					Well Hydrofractured? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> From To		
Geological Material From To (ft.) Color Hardness					Casing Type Single casing Joint Solvent Welded		
CLAY 0 18 RED SOFT					Drive Shoe? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Above/Below		
CLAY/GRAVEL 18 84 BROWN MED-HRD					Casing Diameter Weight Hole Diameter		
CLAY 84 86 BLUE SOFT					4 in. To 96 ft. lbs./ft. 8 in. To 20 ft.		
SAND 86 90 BLACK SOFT					6.5 in. To 112 ft.		
SANDY CLAY 90 95 VARIED SOFT					Open Hole From ft. To ft.		
SAND 95 107 BLACK SOFT					Screen? <input checked="" type="checkbox"/> Type plastic Make CRESTLINE		
HARDPAN 107 112 VARIED HARD					Diameter Slot/Gauze Length Set		
					4 in. 10 10 ft. 96 ft. 106 ft.		
					Static Water Level		
					-0.7 ft. land surface Measure 10/20/2001		
					Pumping Level (below land surface)		
					70 ft. 2 hrs. Pumping at 30 g.p.m.		
					Wellhead Completion		
					Pitless adapter manufacturer 4C-1 Model SNAPPY		
					<input type="checkbox"/> Casing Protection <input checked="" type="checkbox"/> 12 in. above grade		
					<input type="checkbox"/> At-grade (Environmental Wells and Borings ONLY)		
					Grouting Information Well Grouted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Specified		
					Material Amount From To		
					high solids bentonite 3 Sacks 0 ft. 30 ft.		
					Nearest Known Source of Contamination		
					90 feet North Direction Septic tank/drain field Type		
					Well disinfected upon completion? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
					Pump <input type="checkbox"/> Not Installed Date Installed 11/05/2001		
					Manufacturer's name AERMOTOR		
					Model Number S12-75 HP 0.75 Volt 230		
					Length of drop pipe 80 ft Capacity 12 g.p. Typ Submersible		
					Abandoned		
					Does property have any not in use and not sealed well(s)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
					Variance		
					Was a variance granted from the MDH for this well? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
					Miscellaneous		
					First Bedrock Aquifer Quat. buried		
					Last Strat pebbly sand/silt/clay Depth to Bedrock ft		
					Located by Minnesota Geological Survey		
					Locate Method GPS SA Off (averaged) (15 meters)		
					System UTM - NAD83, Zone 15, Meters X 499833 Y 5244959		
					Unique Number Verification Tax Records Input Date 03/09/2017		
					Angled Drill Hole		
					Well Contractor		
					Mark's Well & Pump 69603 SWADER, M.		
					Licensee Business Lic. or Reg. No. Name of Driller		
Remarks							
Minnesota Well Index Report					664027		
					Printed on 09/07/2021		
					HE-01205-15		

750702

County St. Louis
 Quad Silica
 Quad ID 295D

MINNESOTA DEPARTMENT OF HEALTH
WELL AND BORING REPORT
 Minnesota Statutes Chapter 1031

Entry Date
 Update Date 03/21/2017
 Received Date 12/13/2006

<table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">Well Name</td> <td style="width:15%;">Township</td> <td style="width:10%;">Range</td> <td style="width:10%;">Dir Section</td> <td style="width:10%;">Subsection</td> <td colspan="5"></td> </tr> <tr> <td>MCLEAN,</td> <td>56</td> <td>21</td> <td>W 21</td> <td>BBBBDC</td> <td colspan="5"></td> </tr> <tr> <td>Elevation</td> <td>1420</td> <td>Elev. 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Remarks
 DRILLERS: BRUCE BENES, CASEY BENES, & AARON PETZ.

Appendix C

Water Quality Data Summarized in Tables 2, 3, and 4

Electronic Data Submittal