From: Christie Kearney
To: Johnson, Bill H (DNR)
Cc: Oswald, Caroline (She/Her/Hers) (DNR); Ciardelli, Mark C; Kramka, Larry; Colin Marsh
Subject: RE: EXTERNAL SENDER Query 3 - Clarification on Figure 2
Date: Wednesday, August 5, 2026 1:13:59 PM
Attachments: [redacted]

Good afternoon, Bill and Caroline.

In follow-up to this request, I am attaching two updated figures. The changes to each figure are listed below:

- Figure 2 – Added the outline of the 2015 FEIS Category 4 stockpile and labeling for the WWTF (2015 FEIS), OSLA (2015 FEIS), Rail Transfer Hopper (2015 FEIS), and Category 4 Stockpile (2015 FEIS). We did not add labels for the 2015 FEIS Mine Pits, Mine Site Stormwater Ponds, or Haul Roads.
- Figure 3 – Added labeling for the Hydrometallurgical Residue Facility (2015 FEIS) and FTB Seepage Containment System (2015 FEIS)

Let us know if you have any questions about this information.
Best,
Christie

Christie Kearney, P.E.
Environmental & Permitting Manager
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From: Johnson, Bill H (DNR) <bill.johnson@state.mn.us>
Sent: Tuesday, August 4, 2026 3:05 PM
To: Christie Kearney <christie.kearney@newrangecoppernickel.com>
Cc: Oswald, Caroline (She/Her/Hers) (DNR) <caroline.oswald@state.mn.us>; Ciardelli, Mark C <Mark.Ciardelli@Foth.com>; Kramka, Larry <larry.kramka@foth.com>; Colin Marsh <colin.marsh@newrangecoppernickel.com>
Subject: RE: EXTERNAL SENDER Query 3 - Clarification on Figure 2

Hello Christie and all.

For the moment with the explanation provided, DNR will hold off on requesting them. It is good to know however they are available in case later on it is determined to make sense to have a “clean” NewRange Project depiction as part of our documentation.

Since the purpose is to compare/contrast the two different versions of NorthMet with Figures 2 and 3, consider adding labeling to the WWTF (2015 FEIS) and OSLA (2015FEIS) that was done for the 2015 FEIS depictions of the Category 2/3 stockpile, Category 1 stockpile, and OSP on Figure 2. I don’t think it will be too busy with that added labeling. I don’t think the 2015 FEIS roads need to be highlighted with a label.

Not trying to make work here but similar labeling for the Hydromet Residue Facility as well as the FTB on Figure 3 would ensure consistency across the two exhibits.

Thanks for the prompt response. Bill.

Bill Johnson
Planning Director | EWR Environmental Policy & Review Unit

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From: Christie Kearney <christie.kearney@newrangecoppernickel.com>
Sent: Tuesday, August 4, 2026 2:44 PM
To: Johnson, Bill H (DNR) <bill.johnson@state.mn.us>
Cc: Oswald, Caroline (She/Her/Hers) (DNR) <Caroline.Oswald@state.mn.us>; Ciardelli, Mark C <Mark.Ciardelli@Foth.com>; Kramka, Larry <larry.kramka@foth.com>; Colin Marsh <colin.marsh@newrangecoppernickel.com>
Subject: RE: Query 3 - Clarification on Figure 2

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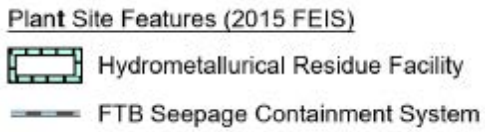
> Operations Center.

Greetings, Bill and Caroline!

The purpose of Figure 2 and Figure 3 are to compare the 2026 NewRange NorthMet Project with the 2015 FEIS features, as shown in the legend on each figure. For Figure 2, we specifically have callouts on the stockpiles, to identify them by name, but the other features are labeled in the legend:



The same is true on Figure 3:



We have generated clean figures of the 2026 NewRange NorthMet Project to be used for the Draft SEIS process; however, the figures provided with our draft preparation notice were intended to provide an easy visualization of the changes in design that have happened between the 2015 FEIS and our new 2026 NewRange NorthMet Project.

If you would prefer to have clean figures at this stage, which don't consider the difference in the project over time, we can provide them at this time. Would these be required for your current decision on if an SEIS is required or for the next stage?

Thank you,
Christie

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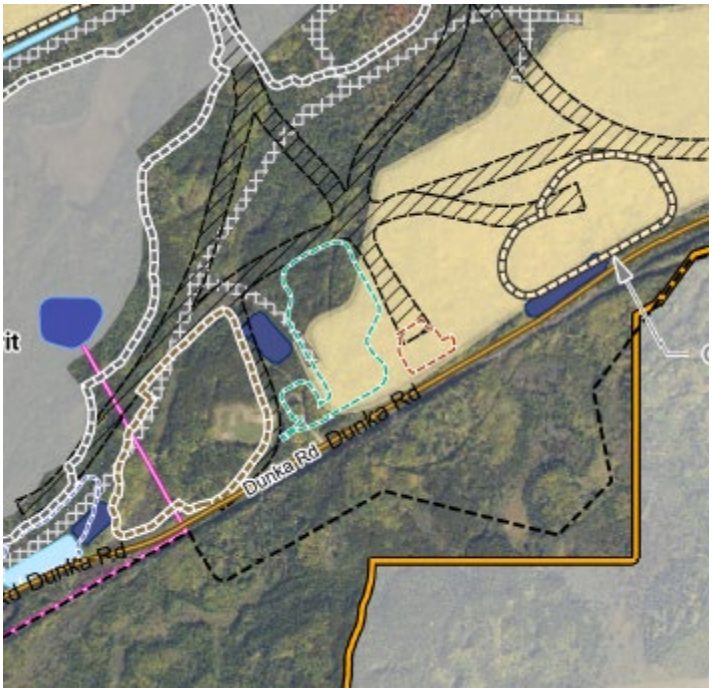
From: Johnson, Bill H (DNR) <bill.johnson@state.mn.us>
Sent: Tuesday, August 4, 2026 1:06 PM
To: Christie Kearney <christie.kearney@newrangecoppernickel.com>
Cc: Oswald, Caroline (She/Her/Hers) (DNR) <caroline.oswald@state.mn.us>
Subject: EXTERNAL SENDER Query 3 - Clarification on Figure 2

Hello Christie. This is Query 3 to support DNR's consideration of NewRange's request and material evidence for the NewRange NorthMet Mining Project.

Table 1, Primary Project Changes, notes on .pdf page 7 that "WWTP and WWTF are combined into a single WWTS at the Plant Site" that represents a change to the Final EIS Action during permitting.

If I'm understanding correctly, Figure 2 is a rendering of the proposed NewRange Project at the Mine Site that includes the now former "shadow polygons" of some previous project features. If this interpretation is correct, then the polygon at the arrow below is the former WWTF that is no longer part of the project? This might be clearer if the former WWTF and former OSLA area were labeled similarly as the "Ore Surge Pile (2015 FEIS)" that is provided on Figure 2.



While this figure does have value, having a “clean” representation of the Mine Site under the NewRange Project probably has value as well. Please consider generating such a figure for DNR’s record. While the same issue is present for Figure 3, it is not quite as pronounced because the hydromet residue facility and FTB are both located on the northern side of the PolyMet Project (and are easier to visually track).

Thanks in advance for your assistance with this matter. Please provide your response as soon as possible to facilitate DNR’s consideration of the request and material evidence. Let me know if you have any questions. Bill J. and Caroline O.

Bill Johnson
Planning Director | EWR Environmental Policy & Review Unit

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DEPARTMENT OF NATURAL RESOURCES

Superior National Forest

Category 4 Stockpile (2015 FEIS)

Category 1 Stockpile (2015 FEIS)

Category 2/3 Stockpile (2015 FEIS)

East Pit

Permanent Rock Storage Facility

Temporary Rock Storage Facility

West Pit

Mud Lake

Ore Surge Pile (2015 FEIS)

Rail Transfer Hopper (2015 FEIS)

Wastewater Treatment Facility (2015 FEIS)

Overburden Storage & Laydown Area (2015 FEIS)

Ore Surge Pile

City of Babbitt

Town of Bassett

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6500 Kensington Dr
Hoyt Lakes, MN USA 55750

Sunrise Project Office
23 Commerce Road
Babbitt, MN USA 55706

FIGURE 2
NORTHMET MINE SITE PROJECT AREA COMPARISON

NAD 1983 2011 StatePlane Minnesota North FIPS 2201 Ft US

DATE: July 29, 2026 | DRAWN BY: Foth, BJW1

Legend

- Current Proposed NorthMet Project Area
- 2015 NorthMet FEIS Project Area
- Site Roads
- Roads
- Public Waters Inventory (PWI) Watercourse
- National Hydrography Dataset (NHD) Flowline
- Municipal Boundary
- Superior National Forest Boundary

Current Proposed Mine Site Features

- Overland Ore Conveyor
- Pit to Plant Pipeline
- Stormwater Dike
- Stormwater
- Equalization Basin
- Contact Water Ponds
- Primary Crusher
- Haul Roads
- Overburden Storage
- Stockpiles
- Mine Pits
- Auxilary Mine Facilities Area

Mine Site Features (2015 FEIS)

- Mine Pit
- Stockpiles
- Overburden Storage & Laydown Area
- Mine Site Pond
- Rail Transfer Hopper
- Haul Roads
- Wastewater Treatment Facility

N

0 1,600 3,200 Feet

Credits: 2025 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from Minnesota Geospatial Commons.

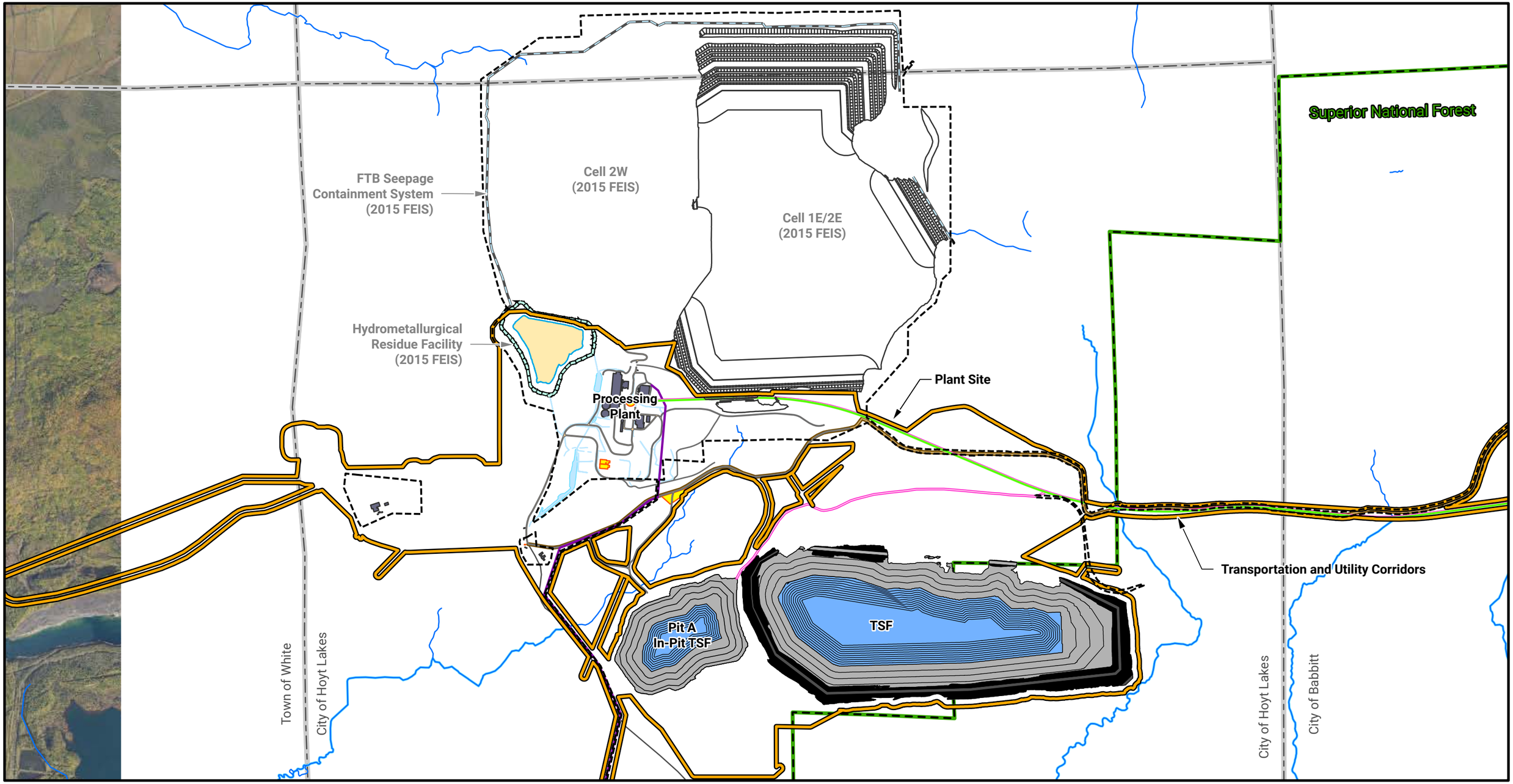

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FIGURE 3
NORTHMET PLANT SITE PROJECT AREA COMPARISON

NAD 1983 2011 StatePlane Minnesota North FIPS 2201 Ft US

DATE: July 29, 2026 | DRAWN BY: Foth, BJW1

Legend

- Current Proposed NorthMet Project Area
- 2015 NorthMet FEIS Project Area
- Site Roads
- Roads
- Public Waters Inventory (PWI) Watercourse
- National Hydrography Dataset (NHD) Flowline
- Municipal Boundary
- Superior National Forest Boundary

Current Proposed Plant/Tailings Features

- Overland Ore Conveyor
- Pit to Plant Pipeline
- Colby Lake Pipeline
- Stormwater
- Plant Roads
- Lined Tailings Storage Facility Footprint
- Existing Building
- Proposed Building

Tailings Storage Facility

- Pond
- Embankment
- Embankment Crest

Plant Site Features (2015 FEIS)

- Hydrometallurical Residue Facility
- FTB Seepage Containment System

N

0 3,000 6,000 Feet

Credits: 2025 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from Minnesota Geospatial Commons.