From: Christie Kearney
To: Johnson, Bill H (DNR)
Cc: Oswald, Caroline (She/Her/Hers) (DNR); Ciardelli, Mark C; Kramka, Larry; Colin Marsh; Lucas Miller
Subject: RE: Query 6 - Plant Site Change in Mining Area of Disturbance
Date: Friday, August 7, 2026 7:57:26 AM
Attachments: image005.png
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image009.png

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Good morning, Bill and Caroline. I apologize for the delay on this response, as the Colby Lake Pipeline project area gave us some trouble due to its overlap in the 2015 FEIS.

The NorthMet Project Areas changed from the 2015 NorthMet FEIS Project Areas in permitting and again with our 2026 NewRange NorthMet Project. The 2026 NewRange NorthMet Project Areas were designed to match most closely with the last regulated boundaries, which were from the 2018 Permit to Mine (PTM). The 2015 FEIS boundaries were only inclusive of the areas that would have changes from existing conditions, not all areas used, as shown by the lack of major features like the railroad corridor that was to be used and the access road from the west connecting Hwy 135. In developing the “Mining Area” with the MDNR for the PTM, NewRange was directed to add include all areas used for the project along with any legacy features that were not yet reclaimed to the “Mining Area”, which expanded the 2015 FEIS Project Areas. This included extensive additions for existing roads, utilities, and a legacy landfill; none of these areas had been accounted for in the 2015 FEIS.

To answer your question, the 2015 FEIS Project Areas included approximately 7,700 acres. The 2026 NewRange NorthMet Project Areas include approximately 7,800 acres. The new area outside the 2015 FEIS Project Areas that are included in the 2026 NewRange NorthMet Project Areas is approximately 4,200 acres, with approximately 4,084 acres that are no longer included in the 2026 NewRange NorthMet Project Area. For comparison, the 2018 Permit to Mine Mining Area is 9,470 acres.

Let me know if you have any questions about these numbers.
Best,
Christie

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From: Johnson, Bill H (DNR) <bill.johnson@state.mn.us>
Sent: Tuesday, August 4, 2026 3:26 PM
To: Christie Kearney <christie.kearney@newrangecoppernickel.com>
Cc: Oswald, Caroline (She/Her/Hers) (DNR) <caroline.oswald@state.mn.us>
Subject: NWR: EXTERNAL SENDER Query 6 - Plant Site Change in Mining Area of Disturbance

Hello Christie. This is Query 6 to support DNR's consideration of NewRange's request and material evidence for the NewRange NorthMet Mining Project.

All 3 figures show the outline of the 2015 NorthMet FEIS Project Area superimposed on the Current Proposed NorthMet Project Area. The polygons enclosed by the Current Proposed NorthMet Project Area would be expected to generally align with the Permit to Mine's regulated "mining area" under a future approval.

The new proposed acreage of mining area (under the NewRange Project) not previously part of the defined PolyMet Project constitutes a change in the project. An RGU considering project acreage in all aspects of potential Environmental Review is a standard metric, in particular for mining actions. This should be a relatively straightforward desktop exercise to calculate.

Breaking this up across the three basic project elements should be fine (i.e., Mine Site; Transportation and Utility Corridor; Plant Site). This can be limited to the acreage of mining area now under the current project but not in the 2015 NorthMet FEIS Project Area. This would include any site roads now part of the project but not before.

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
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