NewRange Request to Supplement Environmental Impact Statement
Finding of Fact 70l - Query 9

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 9 - Existing Pits at Proposed TSF
Date: Monday, August 10, 2026 2:16:46 PM
Attachments: [redacted]

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Greetings, Bill and Caroline. Please see my response below in red.

Please let me know if you have further questions about this topic.
Best,
Christie

Christie Kearney, P.E.
Environmental & Permitting Manager
Mobile: +1-218-461-7746

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From: Johnson, Bill H (DNR) <bill.johnson@state.mn.us>
Sent: Sunday, August 9, 2026 11:44 AM
To: Christie Kearney <christie.kearney@newrangecoppernickel.com>
Cc: Oswald, Caroline (She/Her/Hers) (DNR) <caroline.oswald@state.mn.us>
Subject: NWR: EXTERNAL SENDER Query 9 - Existing Pits at Proposed TSF

Hello Christie. This is Query 9 to support DNR's consideration of NewRange's request and material evidence for the NewRange NorthMet Mining Project.

Section C, Special Studies or Research, of the draft preparation notice text notes on pdf. Page 4:

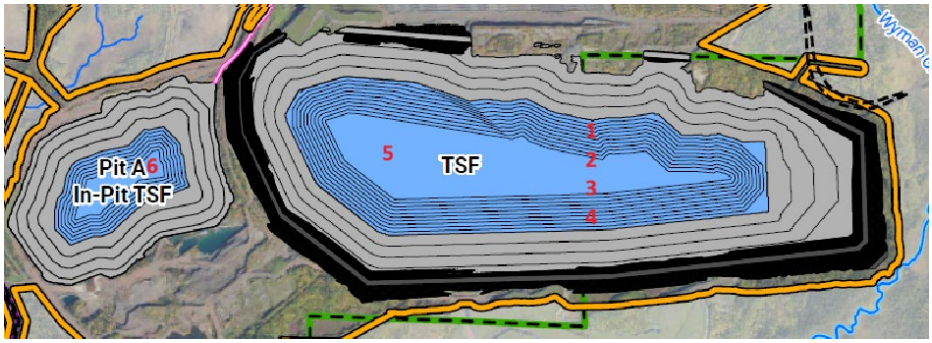
- Tailings Siting – Tailings management will include in-pit disposal. The TSF is located south of the process plant within the Plant Site. The TSF includes filling four former Area 2/3 mine pits with tailings and will result in an in-pit TSF and a TSF with raised embankments to contain low-sulfur tailings over former minelands and a former railroad embankment."

Below is a Google Maps screenshot of the existing site being described in the text excerpt. There are six historic "pit" features that have been numbered for reference purposes.



Here are the questions to answer. A spot is available for NewRange's response that can be used in the email reply if desired. Specifically:

1. Below is a cutout of Figure 3 from the SEIS Request document for the proposed Pit A In-Pit TSF and TSF. Do the numbers added to it correctly correspond to the pit features listed above in the Google Maps image of the proposed site?



NewRange Response: I am attaching a figure from the 404 permit application, Large Figure 17, that show the location of the pits through the footprint of the Pit A In-Pit TSF and TSF. The locations you show above are not quite accurate, as the legacy pits are further north and northwest of your indicated numbers.

2. Do "pits" 1-6 depicted on the Google Maps image have specific historic names or designations back from the LTVSMC operating period? Right now the document just identifies them as "former Area 2/3 mine pits" although the in-pit TSF is referenced as "Pit A" (that may or may not be historic).

   NewRange Response: I am attaching a figure from the 404 permit application, Large Figure 3, that shows the naming convention we have given the four legacy pits in this area: Pits A, B, C, and D. There are historic names for these pits from LTVSMC's operating period, but we are not using them for the NorthMet Project, with the exception of Pit 3, northeast of these pits. The historic names do not differentiate the smaller pits well. For your documentation purposes, Pit A corresponds with LTVSMC Pit 2W and Pits B, C, and D correspond with LTVSMC Pit 2E.

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

Minnesota Department of Natural Resources
Phone: 651-259-5126
Email: bill.johnson@state.mn.us
mndnr.gov

DEPARTMENT OF NATURAL RESOURCES

LTSF
PLANT SITE
TRANSPORTATION AND UTILITY CORRIDORS
Dunka Road
Second Creek
PIT A IN-PIT TSF
TSF
Unnamed Tributary to Wyman Creek
Wyman Creek
Longnose Creek
Second Creek
COLBY LAKE PIPELINE CORRIDOR
Kensington Dr

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Head Office & NorthMet Project Office
6500 Kensington Dr
Hoyt Lakes, MN USA 55750
Sunrise Project Office
23 Commerce Road
Babbitt, MN USA 55706

Large Figure 17
Plant Site Direct Wetland Impacts
2026 Section 404 Permit Application

NAD 1983 StatePlane Minnesota North FIPS 2201 Feet

DATE: July 29, 2026 | DRAWN BY: Barr Engineering Co., ARM2

- NorthMet Project Areas
- Impact Area
- Dunka Road
- Kensington Drive
- Existing Railroads
- Electric Transmission Lines
- Existing Building
- Proposed Building

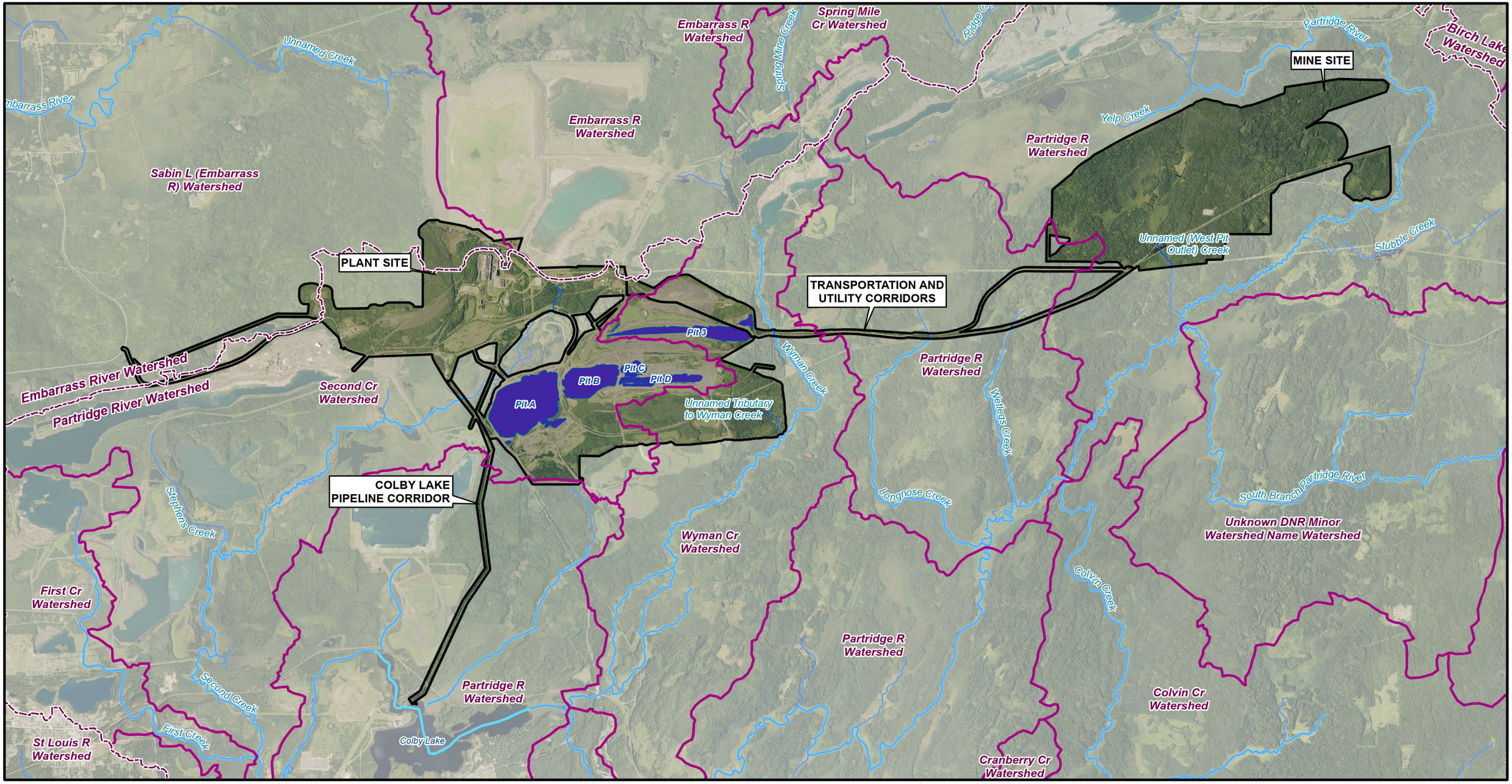
- Public Waters Inventory (PWI) Watercourses
- National Hydrography Dataset (NHD) Rivers & Streams
- Deepwater Pit Lake
- National Wetlands Inventory (NWI)
- Exempt Wetland

Dominant Eggers & Reed (2015) Wetland Community Type
- Alder Thicket
- Coniferous Bog
- Coniferous Swamp
- Deep Marsh
- Hardwood Swamp
- Open Bog
- Seasonally Flooded Basin
- Sedge Meadow, Fresh (Wet) Meadow
- Shallow Marsh
- Shallow, Open Water
- Shrub-Carr

N

0 2,000 4,000 Feet

Credits: 2024 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from MnDNR, MNDOT, USGS.



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Head Office & NorthMet Project Office
6500 Kensington Dr
Hoyt Lakes, MN USA 55750

Sunrise Project Office
23 Commerce Road
Babbitt, MN USA 55706

Large Figure 3
Water Resources
2026 Section 404 Permit Application

NAD 1983 StatePlane Minnesota North FIPS 2201 Feet

DATE: July 29, 2026

DRAWN BY: Barr Engineering Co., ARM2

- NorthMet Project Areas
- Deepwater Pit Lake
- Public Waters Inventory (PWI) Watercourse
- National Hydrography Dataset (NHD) Flowline
- MDNR Level 7 Minor Watershed Divide
- Major Watershed Divide

N

0 1 2 Mi

Credits: 2024 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from MnDNR, MNDOT, USGS.