From: Christie Kearney
To: Johnson, Bill H (DNR)
Cc: Oswald, Caroline (She/Her/Hers) (DNR); Ciardelli, Mark C; Kramka, Larry; Colin Marsh; Lucas Miller; Chris Dobson
Subject: RE: Query 8 - Status of WWTS
Date: Tuesday, August 11, 2026 2:14:44 PM
Attachments: image.png image.png image.png image.png image.png

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

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

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NEWRANGE COPPER NICKEL

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From: Johnson, Bill H (DNR) <bill.johnson@state.mn.us>
Sent: Friday, August 7, 2026 2:49 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 8 - Status of WWTS

Hello Christie. This is Query 8 to support DNR's consideration of NewRange's request and material evidence for the NewRange NorthMet Mining Project.

After the FEIS Adequacy Determination, then PolyMet proposed to eliminate the Mine Site WWTF and create a consolidated water treatment works in the Plant Site WWTS. Part of the reasoning for this was that Mine Site contact water was proposed to be treated and pumped to the FTB via the Mine-to-Plant Pipeline anyway. It was less

impacting (broadly) to have a single water treatment works than two located at the mine and plant sites. For clarification, in the prior project, the Mine Site contact water was proposed to be pumped to the Plant Site WWTS via the Mine-to-Plant Pipeline. From the Plant Site WWTS, the treated mine water was to be routed to the FTB Pond via a separate pipeline. While there was a consolidated water treatment system (called WWTS), it was consolidated in that it was all under one roof, but there were two separate treatment trains, one to treat Mine Site contact water, and one to treat tailings basin seepage.

The current proposal now involves collecting all Mine Site contact water into an equalization basin in the West Pit, with the collected contact water available to be pumped for re-use (unspecified) at the Plant Site. No treatment is proposed. That is correct that the Mine Site contact water is now collected in an equalization basin in the West Pit and pumped via the pit-to-plant pipeline to the Plant Site for initial use and re-use. The pipeline will route this contact water to the constructed and staged TSF ponds (Pit A and Pits B—D) and to the plant site reservoir for use in ore processing. The water in the TSF ponds will be recycled for use at the plant, with excess routed to Pit 3 for storage as potential makeup water. Water in excess of design storage in the TSF and/or Pit 3 will be routed to the WWTP for discharge to the environment.

With this in mind and because the NorthMet SEIS Action Column (in the table) does not use the WWTS nomenclature, but refers only to a WWTP, I'm just confirming the consolidated treatment works designated as the WWTS is no longer a project feature? That is correct that there is no separate water treatment system beside the WWTP, but the wastewater nomenclature from the 2015 FEIS and 2018 permitted project does not apply to the 2026 NewRange NorthMet Project. The 2015 FEIS referred to a WWTF for Mine Site wastewater and WWTP for Plant Site wastewater, while the 2018 permitted project referred to the WWTS for the consolidated WWTF and WWTP treatment trains under one roof. The 2026 NewRange NorthMet Project has a WWTP that is designed for the wastewater that it will need to treat from the project. The 2026 NewRange NorthMet Project redesign includes shifting to an advanced, closed-loop water management approach, recycling water on site to the maximum extent possible. Under this redesign, the WWTP is only needed for water in excess of the planned storage capacity of the active TSF and buffering capacity of the Pit 3 water management basin.

In addition, it appears the Pit to Plant Pipeline "ends" at Pit A In-Pit TSF? The pit-to-plant pipeline is shown on Figure 3 as going to both Pit A in-pit TSF and the Plant Site Reservoir, however, the overland ore conveyor covers most of the alignment to the Plant Site Reservoir on the figure. Is this what is meant by "water within the equalization basin…pumped…to the Plant Site for re-use," and not for example as a source of make-

up water at the processing facility? It is a source of make-up water at the processing plant, which is what is meant by re-use throughout the process. As described above, the water will be part of a closed-loop system, for continuous recycle and reuse to the maximum extent possible.

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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