

## NewRange Copper Nickel LLC – Ferrous Closure Permit to Mine

### 2023-2024 Permit to Mine Annual Report and Operating Plan Worksheet

Per Mineland Reclamation Rules, parts 6130.4400 and 6130.4500, permittees are required to submit two Annual Report (AR) and Operating Plan (OP) hard copies to Minnesota Department of Natural Resources, Division of Lands and Minerals, 1525 Third Avenue East, Hibbing, MN 55746-1461, on or before January 31, 2024, to comply with terms of these Rules and their Permit to Mine (PTM). Electronic submissions of documents and maps are encouraged.

Your facility should have already received an AR and OP request letter from the DNR, detailing items required for submission. This worksheet serves as a guide to assist in compiling those requested items.

#### 2023 Annual Report Contents:

##### 1. Documents:

- a. Preceding year financial and income statements for parent company(ies) or a location where these documents can be viewed or downloaded
  - Check here if including financial and income statements below or as an attachment labeled “Documents 1a”
  - or
  - Check here if providing a website or location to view documents and include below

Following the conversion described in 1(b)., below, NewRange Copper Nickel LLC has two parent companies: (1) PolyMet US Inc. and (2) Teck American, Inc. PolyMet US Inc. is a wholly owned subsidiary of PolyMet Mining Corp. and does not have individualized financial or income statements. Similarly, Teck American, Inc., is a wholly owned subsidiary of Teck Resources Limited, and Teck American, Inc. does not have individualized financial or income statements. NewRange further notes that financial assurance for the permits issued to PolyMet Mining US, Inc., has included significant cash bonding, and NewRange has maintained the required financial assurance through and after the conversion to NewRange.

- b. Any changes in **organizational structure (hierarchy)** or relationships among or within companies involved in the mining operation (i.e., parent companies, owners, principal stockholders, partners, joint ventures, or managing agents)
  - Check here if there has been a change to your company’s organizational information described above and include below or attach as “Document 1b”
  - or
  - Check here if there has been **no change** to your company’s **organizational structure (hierarchy)**

Following a conversion and name change under Minnesota Statutes §§ 302A.682-692 in February 2023, Poly Met Mining, Inc. is now NewRange Copper Nickel LLC (NewRange). NewRange is “for all purposes the same entity that existed before the conversion.” Minn. Stat § 302A.691, subd.1.

NewRange submitted a letter to Joe Henderson on March 3, 2023, notifying the DNR of this conversion and name change, as well as the closing of the combination agreement resulting in NewRange being owned equally by Teck American Inc. and PolyMet US, Inc., which was a wholly owned subsidiary of PolyMet Mining Corp. This joint venture transaction that closed Feb. 14, 2023 did not make any change to the ownership of PolyMet Mining Corp. at the time. On Nov. 7, 2023, PolyMet Mining Corp. became a wholly owned subsidiary of Glencore.

- c. Updated contact information, including contact person and mailing addresses for annual PTM fees and any amendment or assignment fees.

Check here if there has been a change to your company’s contact information and include below or attach as “Documents 1c”

or

Check here if there has been no change to your company’s contact information

Contact	Email	Phone	Contact for:
Christie Kearney	Christie.kearney@newrangepoppernickel.com	218-471-2163	Primary Contact: Director
Kevin Pylka	Kevin.pylka@newrangepoppernickel.com	218-471-2162	Env & Permitting Mgr
Cam Trembath	Cam.trembath@newrangepoppernickel.com	218-471-2178	Compliance Lead

- d. Updated Certificate of Insurance or indicate if self-insured

Check here if providing a new Certificate of Insurance and include below or attach as “Documents 1d”

or

Check here if self-insured and not submitting a Certificate of Insurance

An updated Certificate of Insurance is provided as Document 1d

2. An account of actual mining activities, including:

- a. The actual rate (production amount) of mining in 2023 (tons of product)

Provide information below

or

Provide as attachment “Actual Mining Activities 2a”

No mining occurred on these NewRange lands in 2023.

- b. Types, amounts (tons), source, stockpile location, sequence, and schedule of ore body mining in table format; distinguishing between the following:

- i. Ore
- ii. Lean Ore
- iii. Waste Rock
- iv. Surface Overburden

Provide information in the table below

or

Provide as attachment “Actual Mining Activities 2b”

## 2023 Actual Mining Activities 2b

Type	<i>Ore</i>	<i>Lean Ore</i>	<i>Waste Rock</i>	<i>Surface Overburden</i>	<i>Other [Type Here]</i>
Amount (tons)	0	0	0	0	0
Source	0	0	0	0	0
Stockpile	0	0	0	0	0
Location	0	0	0	0	0
Sequence	0	0	0	0	0
Schedule of Ore Body	0	0	0	0	0

c. Physical and chemical characteristics of mined waste

Provide information below

or

Provide as attachment “Actual Mining Activities 2c”

No mining occurred on these NewRange lands; therefore, no wastes were generated.

d. The ore beneficiating process, including types and amounts of any added chemicals

Provide information below

or

Provide as attachment “Actual Mining Activities 2d”

No mining occurred on these NewRange lands; therefore, no chemicals were used.

e. Tailings disposal:

i. Types

ii. Amounts

iii. Sequence and schedule

iv. Means

v. Deposition location

Provide information in table below

or

Provide a table as attachment “Actual Mining Activities – Tailings Disposal 2e”

### Tailings Disposal 2e

Types of Tailings	0	0	0	0	0
Amounts	0	0	0	0	0
Sequence	0	0	0	0	0
Schedule	0	0	0	0	0
Means	0	0	0	0	0
Deposition Location	0	0	0	0	0

- f. Watershed modifications (i.e., surface water diversions, groundwater level alteration)

Provide information below

or

Provide as attachment “Actual Mining Activities 2f”

NA; there were no watershed modifications made by NewRange on these lands

- g. PTM amendments, assignments, and/or other PTM adjustments approved in 2023

Provide information below

or

Provide as attachment “Actual Mining Activities 2g”

NA; there were no amendments, assignments, or other PTM adjustments on these NewRange lands in 2023

3. An account of actual reclamation activities, including discussion of:

- a. Reclamation construction methods

Provide information below

or

Provide as attachment “Actual Reclamation Activities – Reclamation Construction Methods 3a”

Reclamation was the same in each of the three reclaimed areas. The areas were seeded with a mixture of oats (*Avena Sativa*) at 100 lbs/acre, alsike clover (*Trifolium hybridum*) at 5 lbs/acre, and alfalfa (*Medicago sativa*) at 5 lbs/acre. A Type 1 straw mulch was then applied to each of the areas. A total of 350 red pine (*Pinus resinosa*) were then hand planted across the reclaimed areas.

- b. Vegetation methods, including amounts, locations (include map; see section 6a below), and types of:

- i. Biosolids, if applied
- ii. Fertilizer
- iii. Seed mix
- iv. Mulch
- v. Trees/shrubs planted at each site

Provide information in the table below

or

Provide a table as attachment “Actual Reclamation Activities - Vegetation Methods 3b”

## Vegetation Methods 3b

	Site: <a href="#">Area 2 Road</a>	Site: <a href="#">Pit 3 Ramp</a>	Site: <a href="#">Stockpile 2062</a>	Site:	Site:
<b>Biosolids, if applied:</b> Yes/No?	No	No	No	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
<b>Fertilizer:</b> Type	Not applicable (NA)	NA	NA	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
Amount	NA	NA	NA	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
Location	NA	NA	NA	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
<b>Seed Mix:</b> Type	Oats, Alsike Clover, and Alfalfa	Oats, Alsike Clover, and Alfalfa	Oats, Alsike Clover, and Alfalfa	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
Amount	100 lbs oats, 5 lbs clover, and 5 lbs alfalfa per acre	100 lbs oats, 5 lbs clover, and 5 lbs alfalfa per acre	100 lbs oats, 5 lbs clover, and 5 lbs alfalfa per acre	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
Location	<a href="#">Area 2 Road</a>	<a href="#">Pit 3 Ramp</a>	<a href="#">Stockpile 2062</a>	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
<b>Mulch:</b> Type	NA	NA	NA	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
Amount	NA	NA	NA	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
Location	NA	NA	NA	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
<b>Trees/Shrubs:</b> Type	<a href="#">Red Pine</a>	<a href="#">Red Pine</a>	<a href="#">Red Pine</a>	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
Amount	100	150	100	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
Location	<a href="#">Area 2 Road</a>	<a href="#">Pit 3 Ramp</a>	<a href="#">Stockpile 2062</a>	<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>

c. Number of acres planted at specific locations of completed reclamation

Provide information in the table below/paste below.

or

Provide information as attachment “Actual Reclamation Activities 3c”

[Location and acreage of reclamation is provided in the table below](#)

### Completed Reclamation Activities 3c

Location of Completed Reclamation	Number of Acres Completed Reclamation
<a href="#">Area 2 Road</a>	<a href="#">0.27 Acres</a>
<a href="#">Pit 3 Access Ramp</a>	<a href="#">0.67 Acres</a>
<a href="#">2062 Stockpile</a>	<a href="#">0.68 Acres</a>
<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>
<a href="#">Click or tap here to enter text.</a>	<a href="#">Click or tap here to enter text.</a>

- d. Sequence and schedule/dates when reclamation completed  
 Provide information below  
or  
 Provide as attachment “Actual Reclamation Activities 3d”

Areas were seeded and trees planted in June 2023

- e. Completed or continued reclamation research  
 Provide information below  
or  
 Provide as attachment “Actual Reclamation Activities 3e”

No reclamation research was performed in 2023

4. A description of dust control activities  
 Provide information below  
or  
 Provide as attachment “Dust Control Activities 4”

No dust control activities occurred in 2023 on these NewRange lands

5. Number and location of wetland acres impacted by mining activities during 2023  
a. Progress in complying with the Wetland Conservation Act and include any:  
i. Wetland delineations (completed or in progress)  
 Provide information below  
or  
 Provide as attachment “Wetland Impacts 2023 5, a, i”

Not applicable (NA); no wetlands were impacted by NewRange on these lands

- ii. Annual wetland replacement monitoring report(s)  
 Provide information below  
or  
 Provide as attachment “Wetland Impacts 2023 5, a, ii”

NA; no wetlands were impacted by NewRange on these lands

- iii. An update on wetlands-focused special conditions, if applicable  
 Provide information below  
or  
 Provide as attachment “Wetland Impacts 2023 5, a, iii”

NA; no wetlands were impacted by NewRange on these lands

- iv. An accounting of wetland credits
  - Provide information below
  - or
  - Provide as attachment “Wetland Impacts 2023 5, a, iv”

NA; no wetlands were impacted by NewRange on these lands

6. Maps:

- a. A map depicting mining and reclamation activities described above
  - i. Previous permanent reclamation with a distinct contrasting color
  - ii. Topographical information on all maps
    - Provide map below
    - or
    - Provide as attachment “Maps 6a” (label as “Maps 6a and b” if combined)

The ferrous closure mining area is shown on Large Figure 1, and the reclamation area is shown on Map 6a

- b. A map depicting wetland impact areas (can be combined with 6a)
  - Provide map below
  - or
  - Provide as attachment “Maps 6b” (label as “Maps 6a and b” if combined)

NA; there are no wetlands within the ferrous closure mining area.

**2024 Operating Plan Contents**

1. Anticipated changes from 2023 in:
  - a. The amount of minable reserves, including:
    - i. Factors used to determine minable reserves
    - ii. Factors which would expand or diminish such reserves Provide information below  
 or  
 Provide as attachment “Anticipated Changes 1a”

NA These lands are in closure, no mining will occur

- b. Rate of mining pursuant to MN Rules part 6130.4300, subpart 7, item A
  Provide information below  
 or  
 Provide as attachment “Anticipated Changes 1b”

NA These lands are in closure, no mining will occur

- c. The operating life of the mine
  Provide information below  
 or  
 Provide as attachment “Anticipated Changes 1c”

NA These lands are in closure, no mining will occur

2. Anticipated mining activities pursuant to MN Rules part 6130.4300, subpart 7, item B, including:
  - a. Types, amounts (tons), source, stockpile location, sequence, and schedule of ore body mining in table format; distinguishing between the following:
    - i. Ore
    - ii. Lean Ore
    - iii. Waste Rock
    - iv. Surface Overburden Provide information in the table below  
 or  
 Provide as attachment “Anticipated Mining Activities 2a”

**Anticipated Mining Activities 2a**

Type	<i>Ore</i>	<i>Lean Ore</i>	<i>Waste Rock</i>	<i>Surface Overburden</i>	<i>Other: [Type Here]</i>
Amount (tons)	0	0	0	0	0
Source	0	0	0	0	0
Stockpile	0	0	0	0	0
Location	0	0	0	0	0



b. Physical and chemical characteristics of mined waste

Provide information below

or

Provide as attachment “Anticipated Mining Activities 2b”

NA; these lands are in closure; no mining will occur, and no mined waste will be produced

c. The ore beneficiating process, including a discussion of the type and amount of any chemicals to be added

Provide information below

or

Provide as attachment “Anticipated Mining Activities 2c”

NA; these lands are in closure; no mining will occur, and no chemicals will be used

d. Tailings disposal:

i. Types

ii. Amounts

iii. Sequence and schedule

iv. Means

v. Deposition location

Provide information in table below

or

Provide a table as attachment “Anticipated Mining Activities – Tailings Disposal 2d”

### Anticipated Tailings Disposal 2d

Types of Tailings	0	0	0	0	0
Amounts	0	0	0	0	0
Sequence	0	0	0	0	0
Schedule	0	0	0	0	0
Means	0	0	0	0	0
Deposition Location	0	0	0	0	0

3. Anticipated reclamation per MN Rules 6130.4400, subpart C

Provide information below

or

Provide as attachment “Anticipated Reclamation 3”

No additional reclamation activities are anticipated to occur in 2024

4. Anticipated wetland impact and replacement activities

Provide information below

or

Provide as attachment “Anticipated wetland Impacts 4”

NA; no wetland impacts or replacement activities will occur

5. Maps:

a. A map depicting anticipated mining, stockpiling, construction, reclamation, and watershed modifications

Provide map below

or

Provide as attachment “Maps 5a” (label as “Maps 5a and 5b” if combined)

NA; none of these activities will occur in 2024

b. A map depicting anticipated wetland impact areas (can be combined with 5a)

Provide map below

or

Provide as attachment “Maps 5b” (label as “Maps 5a and 5b” if combined)

NA; there have been no plans for wetland impacts by NewRange on these lands

6. Areas anticipated for deactivation. A Deactivation Plan must be submitted (in duplicate) at least two years before beginning deactivation for any portion of the mining area (MN Rules 6130.4600 and 6130.5400). This plan would represent an amendment per MN Rules 6130.5000 and would replace the operating plan for the portion to be deactivated. Please contact DNR before submitting a Deactivation Request or Deactivation Plan.

Check here if deactivation is anticipated for any areas and contact DNR

Check here if deactivation is not anticipated for any areas

The Deactivation (Closure) Plan for this site was approved under Cliffs Erie and is not applicable to this Ferrous Closure Permit to Mine.

7. Anticipated changes in mining or reclamation plans as compared with approved plans. Note that changes may necessitate a permit amendment. Please contact DNR before submitting an amendment application.

Provide information below

or

Provide as attachment “Anticipated Changes in Mining or Reclamation 7”

No changes are anticipated

### **Report and Map Formatting**

1. Submit an electronic copy of the text in .pdf and maps in both .pdf and georeferenced format (ArcGIS shapefile(s) or .dxf).
2. Maps should be at 1” = 800’ or 1” = 1000’ scale, with location control points (forty lines and section corners; north arrow or compass rose). Include a legend.

3. Show the mining area (i.e., permit limits for pits, stockpiles, tailings basin, etc.) on the maps. Please also show current footprints for features that have not yet reached permit limits.

### **Additional Information**

1. The Framework Agreement Schedule 6.6(b) maps were submitted on November 1, 2018. Confirm if there have been any changes to surface ownership to these maps. This request is per 6130.4500, Item E with reference to 6130.4300, subpart 6. The goal of this is to clearly identify the land and mineral ownership and control (e.g., leases) and confirm that companies can fulfill the purpose and policy (6130.0200) of the Mineland Reclamation Rules and the definition of “operator” (MN Rules 6130.0100, subpart 12). See also special condition #6 of the November 1, 2018 approval of the PTM Assignment.

- a. Indication of any changes since 2018 and clearly identify changes on the map

Provide information below

or

Provide as attachment “Additional Information 1a”

With the exception being the ownership by NewRange (name change from Poly Met Mining, Inc., see 1b), there have been no changes to surface ownership in the Ferrous Closure Mining Area since the Framework Agreement Schedule 6.6(b) maps were provided 11/1/2018.

- b. Confirmation of appropriate control for all surface and mineral parcels required for the operation

Provide information below

or

Provide as attachment “Additional Information 1b”

Ferrous Closure Mining Area lands are wholly owned by NewRange.

2. Financial Assurance

- a. Current amounts and mechanisms (e.g., letter of credit, surety bond, etc.)

Provide information below

or

Provide as attachment “Additional Information 2a”

Irrevocable Letter of Credit (LOC) issued on October 31, in the amount of \$1,000,000; Initial Expiry Date of Nov. 1, 2019 with automatic extensions for consecutive one-year periods after the Initial Expiry Date, unless the Bank notifies NewRange and DNR by registered mail at least 120 days prior to renewal that Bank elects not to consider such renewal. NewRange received an email from DNR Jan. 21, 2022 that our proposed reduction of financial assurance to \$212,000, as laid out in Additional Information 2a, has been approved, and that NewRange can adjust our LOC accordingly. This email and its attachments were included in last year’s AROP as Attachment F. An adjusted, revised LOC will be submitted to DNR Lands and Minerals Division in St. Paul once ready. An adjusted, revised LOC will be submitted to DNR Lands and Minerals Division in St. Paul once ready.

b. Whether cost estimates need to be updated for inflation and/or changed due to disturbance footprints

Provide information below

or

Provide as attachment "Additional Information 2b"

Now that reclamation of the three sites (Area 2 road restoration, Pit 3 access ramp restoration, and 2062 stockpile) is completed (overburden placed on 2026 stockpile and grading completed in 2022, seeding and planting of the three sites in 2023), the cost estimate could be reduced to account for that work being completed. NewRange will hold these costs as is for one more year to account for review of the vegetative growth. Remaining liabilities include the historic rail corridor west of the tailings basin (7.28 acres) that is used for monitoring only and has no reclamation obligation (per DNR release request comments dated 5/17/2022 and 12/7/2022), and the Area 5 road restoration (9.5 acres) that will not be performed until the area is no longer needed for access to Area 5.

If you have any questions or need additional information, please feel free to contact DNR Reclamation Staff.

**Signature:**

I certify the information contained in these documents is true, accurate and complete.

Name (signed) Christie Kearney

Name (typed) Christie Kearney Date: 1/31/2024






## FIGURES AND MAPS

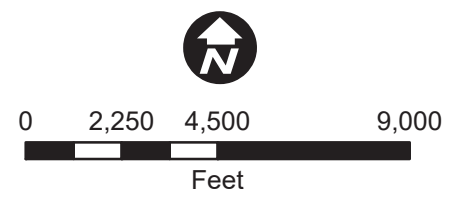


Bar Footer: ArcGIS 10.8.1, 2022-06-29 17:17 File: I:\Client\Polymet\_Mining\Work\_Orders\Permitting\018\_Permit\_to\_Mine\Maps\Reports\Annual\_Report\_Operating\_Plan\Large\_Figure\_3\_-\_Ferrous\_Lands\_Not\_Subject\_to\_Current\_Release\_Request\_2021\_06\_29.mxd User: am2



Public Land Survey Data Source: St. Louis County, 2017.

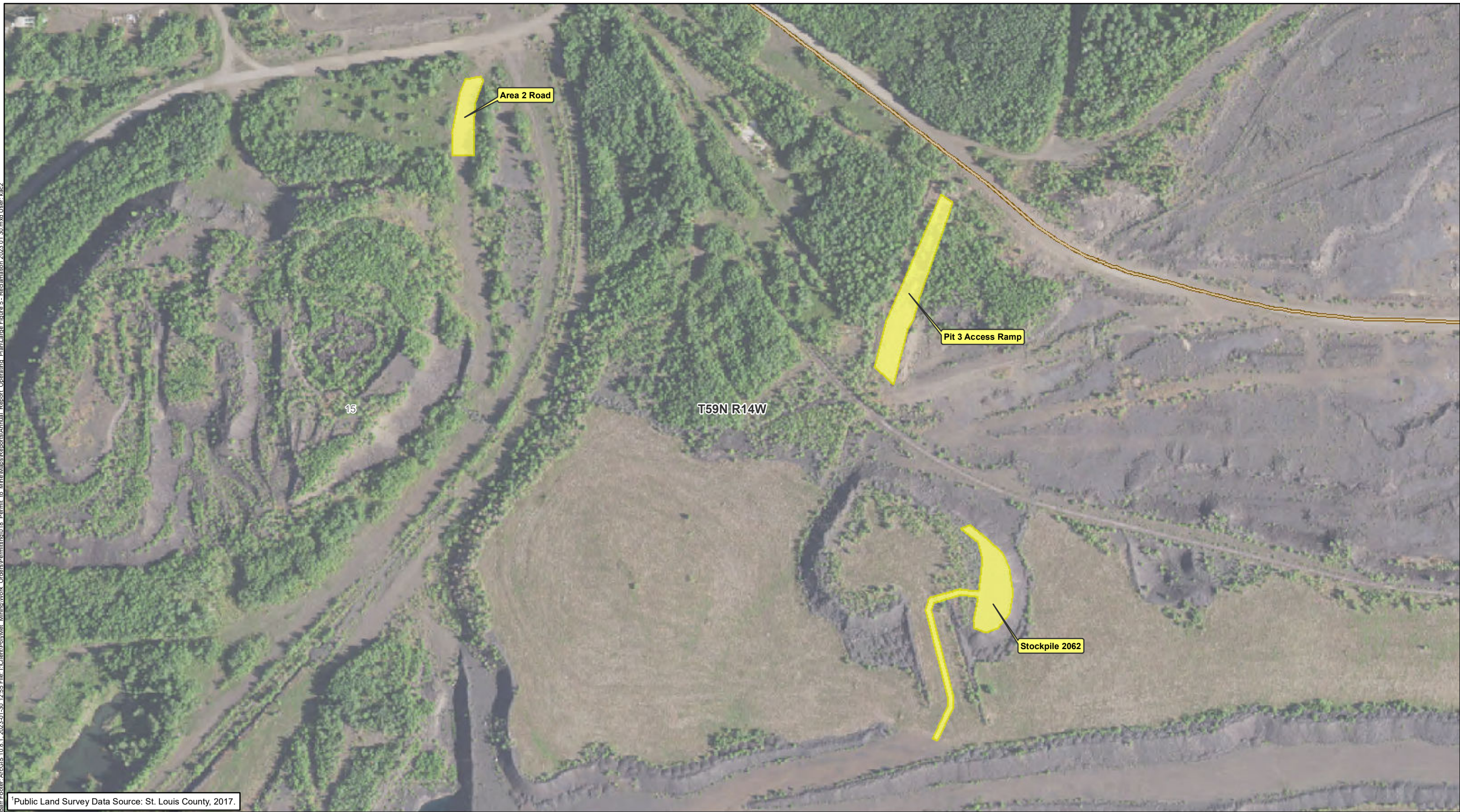
-  PLS Township-Range<sup>1</sup>
-  PLS Section<sup>1</sup>
-  Ferrous Closure Mining Area
-  Area 5 Road
-  Dunka Road







Map 6a  
FERROUS CLOSURE  
MINING AREA  
NewRange Copper Nickel LLC

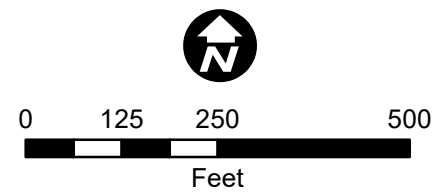


Bar Footer: ArcGIS 10.8.1 - 2023-01-30 12:55 File: I:\Client\Polymet\_Mining\Work\_Orders\Permitting\018\_Permit\_to\_Mine\Maps\Reports\Annual\_Report\_Operations\_Plan\Large\_Figure\_5\_Reclamation\_2023\_01\_30.mxd User: kas2



Public Land Survey Data Source: St. Louis County, 2017.

-  PLS Township-Range<sup>1</sup>
-  PLS Section<sup>1</sup>
-  Reclaimed Areas
-  Dunka Road



Map 6b  
2023 RECLAMATION  
NewRange Copper Nickel LLC



**Documents 1d**

**Certificate of Insurance**





## **Additional Information 2a**

**Financial Assurance Cost Estimate  
(from Aug. 20, 2021 Submittal to DNR;  
approved Jan. 21, 2022 - see 2022-2023 AROP Attachment F)**

**Additional Information 2a: NewRange Ferrous Permit-to-Mine Financial Assurance Estimate (8/20/2021 Update)**

Item	Description	Unit	Quantity	Basis for Quantities (drawing # or describe)	Unit Cost	Cost Extension	Comments	Calculations
1	Area 5 Road Restoration	acre	9.5	NorthMet Non-Ferrous PTM Financial Assurance Estimate Update 2019, Attachment 1 (Lakehead 2019 estimate for restoration of plant site roads and parking lots, see note 2 below)	\$ 4,822	\$ 45,809	Roads which are deemed not necessary for access by the MDNR will be abandoned, scarified, and seeded. The assumption is that this area (two roads, railroad that was disturbed post-1980, and surrounding area) will be reclaimed.	9.5 acres x \$4,822 = \$45,809
2	Area 2 Road Restoration	acre	0.27		\$ 4,822	\$ 1,302	The road surface will be scarified and seeded.	0.27 acres x \$4,822 = \$1,302
3	Pit 3 Access Ramp Restoration	acre	0.67		\$ 4,822	\$ 3,231	The ramp surface will be scarified and seeded.	0.67 acres x \$4,822 = \$3,231
4	2062 Stockpile (6 inches of overburden and seeding)	acre	0.68	NorthMet Non-Ferrous PTM Financial Assurance Estimate Update 2019 Attachment 3 (Ames 2019 unit prices for overburden and haulage costs, Attachment G)  D & T Contingency Reclamation Estimate Letter (Dec. 2, 2019) for fertilizer and seeding per acre	See calculations	\$ 5,649	The cost estimate assumes 6 inches of overburden that was approved August 29, 1997 for Cliffs Erie. Assumes 549 cubic yards of overburden traveling 4 miles round trip.	29,621 square feet x 0.5 ft (6 inch depth of overburden) = 14,810 cubic feet 14,810 cubic feet / 27 cubic feet = 549 cubic yards  Soil Overburden Cost: \$1.90/CY (excavate, load, and dump) x 549 CY = \$1,043  Soil Overburden Haul Cost: \$2 per mile x 549 CY = \$1,098 Assuming 4 mile round trip haul \$1,048 x 4 = \$4,392  Fertilizer and Seeding Cost: \$315 per acre x 0.68 acres = \$214  Total Cost: \$1,043 + \$4,392 + \$214 = \$5,649
5	Mobilization and Demobilization	lump sum	1	Hoover Construction Cost Sheet from 2019 work onsite	\$ 5,350	\$ 5,350	Mob/demob cost is for a haul truck, 345 backhoe, and a D5 dozer	Mob (180+123+900+615+840+574) + Demob (660+451+420+287+264+36) = \$5,350
6	Permit Fees	lump sum	4	Minnesota Statute, for inactive ferrous operations	\$ 30,000	\$ 120,000	Four years of permit fees prior to the assignment of these areas to PolyMet's non-ferrous permit to mine	4 years x \$30,000 = \$120,000
7	Administrative Oversight	hours	80 / 40	NorthMet Non-Ferrous PTM Financial Assurance Estimate Update 2019 Attachment 2 (NTS 3/22/19 letter Professional II, Attachment D2) and confirmation on attached 2021 NTS Staff Rates	\$ 110	\$ 22,000	Four years; two business weeks for one year of reclamation work and one business week for three years of monitoring (see note 3)	(80 hrs x 1 year x \$110) + (40 hrs x 3 years x \$110) = \$22,000
					<b>Total Direct Costs</b>	<b>\$ 203,340</b>		
					10% Contingency	\$ 8,334	10% of all items except #6 (see note 3)	(\$203,340 - \$120,000) * 10% = \$8,334
					<b>Total Costs</b>	<b>\$ 211,674</b>		
					<b>Proposed Financial Assurance</b>	<b>\$ 212,000</b>		

Legacy Notes:

1. Per GIS, the area between the Tailings Basin and Area 5 is 9.5 acres, 0.27 acres for the Area 2 road, 0.67 acres for the Pit 3 access ramp, and 0.68 acres for the 2062 Stockpile. (See submitted shapefile.)
2. The unit cost (including mobilization) was determined from the Legacy FA lump sum by Lakehead for Road and Parking Lot Restoration (\$195,000) divided by the area of roads (40.44 acres). The restoration unit cost is \$4,822/acre.
3. The administrative oversight and contingency calculations are in accordance with the DNR's examples provided.

2062 Stockpile Notes:

1. Access width will be 16 feet in order to minimize impacts to already-vegetated areas of the stockpile.
2. Historic reclamation of the 2062 stockpile used 6 inches of overburden as described in the 2007-2008 Cliffs Erie AROP. The 2062 Stockpile met the 10 year standards in 2017.
3. Section 2.2 of the approved Cliffs Erie Closure Plan describes the use of 6 inches of till material for stockpile reclamation.

## **Attachment A**

**2022-2023 AROP Comments**

<b>Report:</b>	<b>2022-2023 Polymet Ferrous AROP DNR Comments</b>	
<b>Review Team:</b>	Jennifer Engstrom, Jon Beyeler, Kathryn Larson, and Malory Sauter	
<b>Submittal Date:</b>	January 31, 2023	
<b>Comment ID</b>	<b>Page/Paragraph</b>	<b>DNR Initial Comments (December 21, 2023)</b>
<b>Annual Report</b>		
1	3.4.1	The two roads to Area 5 west of the existing basin (9.5 acres) will be inspected for reclamation success in 2024 or later, as appropriate. No response required.
<b>Operating Plan</b>		
2	4.9	It is understood that the entirety of the Cliffs Erie Closure Plan is not entirely applicable to this site. The Closure Plan has been essentially modified with the DNR letter dated December 13, 2022 (i.e., identification of approximately 18.4 acres with remaining reclamation obligations). Note a response was not required per the December 9, 2022 AROP Requested letter. No response required.