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Document transmitted electronically only

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Reference: *NorthMet Project MOA Stipulation VIII – Implementation Reporting*
(USFS File No. 2360; USACE No: 1999-5528-JKA; SHPO File No. 2011-0526 MOA)

The Memorandum of Agreement Among United States Forest Service; Superior National Forest; United States Army Corps of Engineers, St. Paul District; the Advisory Council on Historic Preservation; Poly Met Mining, Inc.; and the Minnesota Historic Preservation Office Regarding the NorthMet Mining Project, St. Louis County, Minnesota (hereinafter NorthMet Project MOA) Stipulation VIII states that PolyMet shall annually provide a “summary report detailing activities carried out and/or completed under the terms of this MOA during the preceding year.”

Following a conversion and name change under Minnesota Statutes §§ 302A.682-692, 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 will therefore assume responsibility for satisfying all relevant terms and conditions of the MOA ascribed to PolyMet.

Pursuant to Stipulation VIII, attached is a table (Table 1) detailing the status of implementation of the stipulations of the NorthMet Project MOA. To date, NewRange has completed several of the MOA Stipulations. Many of the remaining stipulations are in progress. The schedule for initiating work on any remaining stipulations depends on the status of pending litigation and having actionable permits. Information pertaining to any remediation activities completed pursuant to I.D.1 and a list of properties that received Interim Treatment pursuant to Stipulation I.D.2 is provided following Table 1.

If you have any questions or require further information, please do not hesitate to contact me at kevin.pylka@newrangecoppernickel or 218-750-2054

Sincerely,

Kevin Pylka
Permitting and Environment Manager
NewRange Copper Nickel LLC

Table 1. Implementation of NorthMet Project MOA Stipulations

MOA STIPULATION	STATUS
I. Erie Mining Landscape Historic District	
I.A. Phase II Intensive Survey and Report for Historic District	<p>COMPLETE</p> <ul style="list-style-type: none"> • Draft report and inventory forms provided by Co-leads to SHPO on December 19, 2019; SHPO provided comment on January 24, 2020 (Stipulation I.A.5) • Final report and inventory forms provided by Co-leads to SHPO on January 8, 2021 (Stipulation I.A.8)
I.B. Historic Property Documentation Plan	<p>COMPLETE</p> <ul style="list-style-type: none"> • Draft documentation plan provided by Co-leads to SHPO on January 8, 2021 (Stipulation I.B.2.b); SHPO concurred with Plan April 19, 2021 • Final documentation submitted to Co-Leads/SHPO on January 3, 2022.
I.C. Phase I Reconnaissance of the Historic District Outside the APE	<p>Initiated April 2023</p> <ul style="list-style-type: none"> • Draft Research Design submitted on July 26, 2022, review is pending with USFS, USACE and SHPO • Limited field reconnaissance began in 3rd Qtr. 2023
I.D. Interim Treatment of Historic Properties (see below for details on remediation activities)	<p>COMPLETE</p> <ul style="list-style-type: none"> • Interim Treatment (Stipulation I.D.2 – see below for a full list of Interim Treatment properties) <ul style="list-style-type: none"> ○ Final Phase II inventory forms provided by Co-leads to SHPO on September 10, 2019 (Stipulation I.D.2.b) ○ Final Level I MHPRs provided by Co-leads to SHPO on June 9, 2020 (Stipulation I.D.2.c) <p>Update</p> <ul style="list-style-type: none"> • Remediation activities (Stipulation I.D.1) <ul style="list-style-type: none"> ○ Activities initiated in 2018. Activities will continue, as necessary.
II. Spring Mine Lake Sugarbush	
II.A. Phase II Intensive Survey & Inventory Form	<p>COMPLETE</p> <ul style="list-style-type: none"> • Final research design provided by Co-leads to SHPO and Consulting Bands on August 28, 2019 (Stipulation II.A.1) • Field survey completed October 9-18, 2019 • Bois Forte Band of Chippewa provided a Tribal monitor during fieldwork (Stipulation II.A.2) • Draft report prepared by PolyMet and provided by the Co-leads to SHPO and the Consulting Bands on January 8, 2021 (Stipulation II.A.6) • Report completed & accepted by SHPO 9/8/2021 • Submitted a second site form to SNF for 21SL1263/SL-HLC-017 on December 21, 2021 • SNF submitted second site form to Dave Mather, SHPO for 21SL1263/SL-HLC-017 via email December 2021.

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	<ul style="list-style-type: none"> SHPO acknowledged receipt of the inventory form and site form for SL-HLC-017/21SL126 on 3/28/2022 via email.
II.B. Protection Measures	<p>COMPLETE</p> <ul style="list-style-type: none"> Co-leads provided documentation of completion to SHPO and the Consulting Bands on July 3, 2019 (Stipulation II.B.3)
II.C. Band Member Access	<p>In Progress</p> <ul style="list-style-type: none"> PolyMet met with the Co-leads and Consulting Bands on August 20 and October 29, 2019 regarding developing the access agreement Draft agreement provided by PolyMet to Co-leads and Consulting Bands on December 16, 2020 Follow-up letter by PolyMet sent to Consulting Bands on 3/23/2022 requesting moving forward to final execution. Ongoing NewRange coordination with Consulting Bands on this agreement, with more expected in 2024
II.D. Sugar Maple Management Plan	<p>Not Yet Initiated</p> <ul style="list-style-type: none"> Anticipated start in 2024
II.E. NRHP Nomination	<p>Not Yet Initiated</p> <ul style="list-style-type: none"> Anticipated start date to be determined
III. Beaver Bay to Lake Vermillion Trail (BBLV): Partridge River Segment	
III.A. Phase III Recordation Survey & Inventory Form	<p>COMPLETE</p> <ul style="list-style-type: none"> Final research design provided by Co-leads to SHPO and Consulting Bands on February 16, 2018 (Stipulation III.A.2) Field survey completed May 17-18, 2018 Bois Forte Band of Chippewa provided a Tribal monitor during fieldwork (Stipulation III.A.1.b) Final Phase III report provided by Co-leads to SHPO and Consulting Bands on February 5, 2019 (III.A.5)
III.B. Historic Context for BBLV	<p>Not Yet Initiated</p> <ul style="list-style-type: none"> Anticipated start date to be determined
III.C. Trail Survey on SNF Lands & MPDF	<p>SNF responsibility</p>
IV. Mesabe Widjiu: Partridge River Segment	
IV.A. Bands Site Visit	<p>COMPLETE</p> <ul style="list-style-type: none"> Site visit with Consulting Band THPOs completed October 1, 2019
IV.B. Ethnographic/Ethnohistoric Study	<p>Not Yet Initiated</p> <ul style="list-style-type: none"> Anticipated start date to be determined

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IV.C. Historic Property Management Plan & NRHP Nomination	Not Yet Initiated <ul style="list-style-type: none"> • Anticipated start date to be determined
VII. Post-Review Discoveries	
VII.A.-F.	COMPLETE <ul style="list-style-type: none"> • PolyMet drafted an Inadvertent Discoveries Plan in 2017/early 2018 and is currently using it to train staff and contractors
XI. Amendment	
	Amendment 1 to the MOA was initiated on December 4, 2023. The following were amended: <ul style="list-style-type: none"> • Amend Stipulation XI so it reads as follows: The MOA shall remain in effect until December 27, 2025, unless otherwise amended or revised prior to that date pursuant to Stipulation XI. 2. • Insert Stipulation IX.D so it reads as follows: The parties recognize that NewRange Copper Nickel LLC will assume responsibility to complete all relevant terms, conditions, and actions assigned to PolyMet Mining, Inc. under the original Agreement as of the date of Amendment #1 to the MOA. • At time of this final report, the parties are awaiting ACHP signature as the final signatory to the amendment, with signatures from the USFS, USACE and SHPO complete along with invited signatory NewRange.