



**NewRange Copper Nickel LLC**

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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.

If you have any questions or require further information, please do not hesitate to contact me at [kevin.pylka@newrangecoppernickel](mailto: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
<b>I. Erie Mining Landscape Historic District</b>	
I.A. Phase II Intensive Survey and Report for Historic District	<p>COMPLETE</p> <ul style="list-style-type: none"> <li>• 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)</li> <li>• Final report and inventory forms provided by Co-leads to SHPO on January 8, 2021 (Stipulation I.A.8)</li> </ul>
I.B. Historic Property Documentation Plan	<p>COMPLETE</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Final documentation submitted to Co-Leads/SHPO on January 3, 2022.</li> </ul>
I.C. Phase I Reconnaissance of the Historic District Outside the APE	<p>Initiated April 2023</p> <ul style="list-style-type: none"> <li>• Draft Research Design submitted on July 26, 2023. A review response was not received from the USFS, USACE or SHPO.</li> <li>• Field reconnaissance began in 3<sup>rd</sup> Qtr. 2023 and continued into 2024</li> <li>• A draft version of the Final Report is expected to be submitted to the USFS and USACE in January 2025.</li> </ul>
I.D. Interim Treatment of Historic Properties	<p>COMPLETE</p> <ul style="list-style-type: none"> <li>• Remediation activities (Stipulation I.D.1) <ul style="list-style-type: none"> <li>○ Activities initiated in 2018. Documented in previous annual reports</li> </ul> </li> <li>• Interim Treatment (Stipulation I.D.2) <ul style="list-style-type: none"> <li>○ Final Phase II inventory forms provided by Co-leads to SHPO on September 10, 2019 (Stipulation I.D.2.b)</li> <li>○ Final Level I MHPRs provided by Co-leads to SHPO on June 9, 2020 (Stipulation I.D.2.c)</li> </ul> </li> </ul>
<b>II. Spring Mine Lake Sugarbush</b>	
II.A. Phase II Intensive Survey & Inventory Form	<p>COMPLETE</p> <ul style="list-style-type: none"> <li>• Final research design provided by Co-leads to SHPO and Consulting Bands on August 28, 2019 (Stipulation II.A.1)</li> <li>• Field survey completed October 9-18, 2019</li> <li>• Bois Forte Band of Chippewa provided a Tribal monitor during fieldwork (Stipulation II.A.2)</li> <li>• 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)</li> <li>• Report completed &amp; accepted by SHPO 9/8/2021</li> <li>• Submitted a second site form to SNF for 21SL1263/SL-HLC-017 on December 21, 2021</li> </ul>

Table 1. Implementation of NorthMet Project MOA Stipulations

<b>MOA STIPULATION</b>	<b>STATUS</b>
	<ul style="list-style-type: none"> <li>• SNF submitted second site form to Dave Mather, SHPO for 21SL1263/SL-HLC-017 via email December 2021.</li> <li>• SHPO acknowledged receipt of the inventory form and site form for SL-HLC-017/21SL126 on 3/28/2022 via email.</li> </ul>
II.B. Protection Measures	<p>COMPLETE</p> <ul style="list-style-type: none"> <li>• Co-leads provided documentation of completion to SHPO and the Consulting Bands on July 3, 2019 (Stipulation II.B.3)</li> </ul>
II.C. Band Member Access	<p>In Progress</p> <ul style="list-style-type: none"> <li>• Ongoing NewRange coordination with Consulting Bands continued in 2024, including a tour of the Sugarbush with Bois Forte and Grand Portage leadership.</li> <li>• Access coordination will continue in 2025.</li> </ul>
II.D. Sugar Maple Management Plan	<p>In Progress</p> <ul style="list-style-type: none"> <li>• Limited early coordination work was begun in 2024.</li> <li>• Coordination toward a plan will continue in 2025, including a workgroup meeting in January.</li> </ul>
II.E. NRHP Nomination	<p>Not Yet Initiated</p> <ul style="list-style-type: none"> <li>• Anticipated start date to be determined</li> </ul>
<b>III. Beaver Bay to Lake Vermillion Trail (BBLV): Partridge River Segment</b>	
III.A. Phase III Recordation Survey & Inventory Form	<p>COMPLETE</p> <ul style="list-style-type: none"> <li>• Final research design provided by Co-leads to SHPO and Consulting Bands on February 16, 2018 (Stipulation III.A.2)</li> <li>• Field survey completed May 17-18, 2018</li> <li>• Bois Forte Band of Chippewa provided a Tribal monitor during fieldwork (Stipulation III.A.1.b)</li> <li>• Final Phase III report provided by Co-leads to SHPO and Consulting Bands on February 5, 2019 (III.A.5)</li> </ul>
III.B. Historic Context for BBLV	<p>Not Yet Initiated</p> <ul style="list-style-type: none"> <li>• Anticipated start date to be determined</li> </ul>
III.C. Trail Survey on SNF Lands & MPDF	<p>USFS-SNF responsibility</p>
<b>IV. Mesabe Widjiu: Partridge River Segment</b>	
IV.A. Bands Site Visit	<p>COMPLETE</p> <ul style="list-style-type: none"> <li>• Site visit with Consulting Band THPOs completed October 1, 2019</li> </ul>
IV.B. Ethnographic/Ethnohistoric Study	<p>Not Yet Initiated</p> <ul style="list-style-type: none"> <li>• Anticipated start date to be determined</li> </ul>

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<b>MOA STIPULATION</b>	<b>STATUS</b>
IV.C. Historic Property Management Plan & NRHP Nomination	Not Yet Initiated <ul style="list-style-type: none"> <li>• Anticipated start date to be determined</li> </ul>
<b>VII. Post-Review Discoveries</b>	
VII.A.-F.	COMPLETE <ul style="list-style-type: none"> <li>• PolyMet drafted an Inadvertent Discoveries Plan in 2018 and is currently using it to train staff and contractors</li> </ul>
<b>XI. Amendment</b>	
	Amendment 1 to the MOA was initiated on December 4, 2023. The following were amended: <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• The ACHP signature, as the final signatory to the amendment, was completed on 12/21/2023. The other parties completing signatures were the USFS, USACE, SHPO and NewRange Copper Nickel.</li> </ul>