United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Washington, D.C. 20240
http://www.blm.gov

February 28, 2020

In Reply Refer To:
1278-FOIA (640)
FOIA# 2019-00938
1:19-CV-01857

Austin R. Evers
American Oversight
1030 15th Street NW, Suite B255
Washington, DC 20005

Dear Mr. Evers:

This letter is an interim response to your Freedom of Information Act (FOIA) requests, dated March 5, 2019 and April 23, 2019 and assigned tracking numbers 2019-00938 and 2019-00952. In your letter, you asked for the following:

All records reflecting communications (including email messages, email attachments, calendar invitations or entries, and any handwritten or typed notes from meetings) between the custodians listed below and the following individuals and entities:

a. Any employee or representative of Antofagasta PLC, including anyone with an email address ending in antofagasta.co.uk;
b. Andronico Luksic, and anyone acting on his behalf such as a chief of staff, scheduler, or assistant;
c. Ivan Arriagada, and anyone acting on his behalf such as a chief of staff, scheduler, or assistant;
d. Any employee or representative of Twin Metals Minnesota (TMM), including anyone with an email address ending in twin-metals.com;
e. Robert Lehman (including but not limited to the email address rob.lehman@wilmerhale.com); and/or
f. Timothy Martin (including but not limited to the email address timothy.martin@wilmerhale.com).

All communications (including email messages, email attachments, calendar invitations or entries, and any handwritten or typed notes from meetings) between the custodians listed below and the following individuals and entities, regarding the mining leases of Twin Metals in Minnesota:

a. Representative Tom Emmer, and anyone acting on his behalf or serving on his

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staff, including but not limited to Christopher Maneval (Christopher.Maneval@mail.house.gov), David Fitzsimmons (David.fitzsimmons@mail.house.gov), Alyssa Anderson (alyssa.anderson@mail.house.gov), Landon Zinda (landon.zinda@mail.house.gov), and Catherine Lenz (Catherine.lenz@mail.house.gov).

b. Representative Paul Gosar, and anyone acting on his behalf or serving on his staff, including but not limited to Thomas Van Flein (tom.vanflein@mail.house.gov), Leslie Foti (leslie.foti@mail.house.gov), Rory Burke (rory.burke@mail.house.gov), and Jeff Small (jeff.small@mail.house.gov).

While we are still reviewing documents for responsiveness, we reviewed 1815 pages and out of these 6 pages were found to be responsive. We are providing via email a PDF file consisting of 6 pages, which is being released in full.

Keiosha Alexander, Bureau of Land Management (BLM) FOIA Officer, is responsible for this release.

If you have any questions regarding this request, please contact Sheriff Oladepo, BLM WO FOIA Specialist, at (202) 912-7650 or via email at BLM_WO_FOIA@blm.gov.

Sincerely,

KEIOSHA ALEXANDER
Digitally signed by KEIOSHA ALEXANDER
Date: 2020.02.28 12:36:07 -05'00'

For Ryan Witt, Acting Chief
Division of Intergovernmental and External Affairs

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From:	Bob McFarlin
To:	mleveret@blm.gov; kbenedetto@blm.gov
Cc:	Anne Williamson
Subject:	Thank you & Further Information
Date:	Tuesday, December 19, 2017 1:08:29 PM
Attachments:	20171024_encampment_letter_explorer_intent_to_terminate.pdf Letter to MN House Mining Committee 2-5-15.pdf

Dear Kathy and Mitch:

Thank you for meeting with Anne Williamson and me last week in D.C. We greatly appreciate your time and consideration. As follow-up to a couple of issues we discussed I have attached the following two documents:

1. The recent letter sent by Encampment Minerals to the Minnesota Dept. of Natural Resources relinquishing rights to 23 state minerals leases, citing as cause the US Forest Service/BLM land withdrawal proposal. Encampment's letter represents a loss of potential jobs in the region – immediate and future – and a loss of potential school trust fund revenues.
2. A letter Twin Metals sent to the Minnesota House Mining and Outdoor Recreation Committee in Feb. 2015 following a hearing on mining issues. Please note item #5. Twin Metals has used this information and reference frequently in responding to stakeholder and media questions about Acid Rock Drainage, as well as deliberate misinformation.

Also, I have pasted below an e-mail correspondence that was broadly distributed to stakeholders earlier this year referencing updated project data released by Twin Metals. Please also note the highlighted bullet on the potential for acid generation. This reference is also in our website material at: http://www.twin-metals.com/about-the-project/project-facts/. Thank you again for your time.

(Stakeholder e-mail distributed May 25, 2017)
Dear :

Twin Metals Minnesota has made significant progress over the past few years in furthering the conceptual design of its developing underground mine project. Twin Metals has released updated technical and economic information that captures this progress and sets the foundation for ongoing public reference and discussion about the project. I am writing to make you aware of this information and to guide you to further details.

As you know, the Twin Metals project is located approximately nine miles southeast of Ely and 11 miles northeast of Babbitt. The project site is located outside the boundaries and state and federal buffer zones of the Boundary Waters Canoe Area, in an area where mining is both allowed and encouraged by state and federal law.

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Key updated technical and economic aspects of the preliminary project design include:

Twin Metal's current preliminary project design is more efficient and compact than mine designs previously studied, greatly minimizing surface impacts.

The Twin Metals project is being designed to process approximately 20,000 tons of mineralized ore per day from a single identified mineral deposit, the Maturi Deposit. Previous project designs were based on processing 50,000 tons per day.

The current project design would create an estimated 650 direct mining jobs and more than 1,300 indirect spinoff jobs in a variety of industries throughout Northeast Minnesota, serving generations of Minnesotans.

The project's three year construction phase will generate several million labor hours for construction trades and other professions.

More than $1.2 billion will be invested in further design and project construction.

Approximately half of the tailings material from mine operations will be stored as permanent backfill in the underground mine. The remaining tailings material will be stored in a modern, lined surface storage facility. In its future formal mine plan proposal, Twin Metals intends to propose the tailings storage facility next to an existing mine southwest of Babbitt.

Scientific testing has confirmed that the tailings material from mine operations will be non-acid generating.

The engineering, technical, environmental and economic work on the project will continue as Twin Metals works toward its goal of submitting in approximately two years a formal mine project proposal to state and federal agencies for extensive environmental review. However, the future of the Twin Metals project is dependent on successful resolution of the company's federal mineral lease issues and the proposed withdrawal of federal lands in Northeast Minnesota from future mineral exploration and development. Twin Metals is continuing to pursue legal remedies to secure renewal of its federal mineral leases, and the company is joining Northeast Minnesota citizens, businesses, local governments and others to strongly oppose the withdrawal of federal lands in the region. Please contact me if you would like additional information on these critical issues.

I have attached an updated fact sheet about the Twin Metals project. I also encourage you to visit the Twin Metals website – http://www.twin-metals.com/about-the-project/project-facts/ – for more details on the updated preliminary project information.

Twin Metals is excited to move forward in the ongoing development of its underground mine proposal. The Twin Metals project offers the region a great opportunity for long-term, environmentally safe job creation and economic growth. Thank you for your continued interest and support.

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Bob McFarlin
Government Affairs Advisor
Twin Metals Minnesota
380 St. Peter St., Suite 705
St. Paul, MN 55102
612-655-2099 (c)

www.Twin-Metals.com

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ENCAMPMENT MINERALS, INC.

Two Midtown Plaza, Suite 1990
1349 West Peachtree Street
Atlanta, Georgia 30309
Phone (404) 876-1990
Fax (404) 876-6532

P. O. Box 1186
Golden, Colorado 80402
Phone (303) 619-0311
Fax (303)-279-1197
Email: CHATHL@AOL.COM

October 24, 2017

Mr. Jess Richards
Director, Division of Lands and Minerals
Department of Natural Resources
500 Lafayette Road
Saint Paul, MN 55155-4045

Dear Director Richards:
Encampment Minerals, Inc. (EMI), with this letter, provides notice that it is relinquishing 23 (twenty three) Minnesota state mineral leases effective as soon as the 60 day notice period expires from the date of this letter. The leases are listed below. These leases consist of state mineral lands generally about 8 to 15 miles west to southwest of Isabella in Lake County in townships T58N, R10W and T59N, R10W. These are north of or on the Laurentian Divide and are intertwined with Superior National Forest lands for which the USFS has proposed a 20 year withdrawal from mineral entry.

Encampment leased these lands in 2012 to pursue innovative, grassroots exploration concepts for Cu-Ni-PGM mineralization in the interior of the Duluth Complex. However, the proposed USFS withdrawal discourages EMI from further exploration because development of any discovery on state leases would likely require access across USFS lands, access to BLM minerals, or other activity in an area now clouded by regulatory uncertainty.

Mineral leases to be relinquished:

MM-10423	MM-10431	MM-10439
MM-10424	MM-10432	MM-10440
MM-10425	MM-10433	MM-10441
MM-10426	MM-10434	MM-10442
MM-10427	MM-10435	MM-10443
MM-10428	MM-10436	MM-10444
MM-10429	MM-10437	MM-10445
MM-10430	MM-10438	

Respectfully,

Harold J. Noyes
President

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February 5, 2015

Honorable Representative Tom Hackbarth
Chairman, MN House Mining and Outdoor Recreation Committee
409 State Office Building
St. Paul, MN 55155

Dear Chairman Hackbarth:

Thank you for providing Twin Metals Minnesota (TMM) the recent opportunity to present information to the Mining and Outdoor Recreation Committee regarding the development status of our underground copper-nickel-PGM mining project in northeast Minnesota. I am writing to provide you and the committee greater detail on issues that arose during the hearing. Much of the information provided below references the TMM Project's Prefeasibility Study (PFS) Technical Report, which can be accessed in full at: http://www.twin-metals.com/wp-content/uploads/2012/09/TMM-Project-PFS-Technical-Report.pdf. The PFS Technical Report confirms that the TMM Project offers northeast Minnesota an extraordinary opportunity for long-term, environmentally-sound economic growth and job creation.

Committee Hearing Issues

1. Rep. Yarusso asked a question regarding the directional flow of water at the far west end of the Birch Lake Reservoir at the point where the Twin Metals Minnesota PFS-level conceptual mine layout shows an underground crossing of a possible pipeline corridor. At that exact point, the water flow is to the southeast, eventually turning to the north. The water elevation and flow rate of the Birch Lake Reservoir is managed by Minnesota Power (http://www.mnpower.com/Environment/WaterTable).

2. In testimony by a spokesperson on behalf of the organization Northeastern Minnesotans for Wilderness (NMW), it was suggested that Twin Metals and new owner, Antofagasta, have plans to convert the TMM Project from an underground mining proposal to an open pit mining proposal. Such speculation is not supported by the PFS Technical Report, which is based exclusively on the TMM Project's long-standing underground mine concept. The PFS Technical Report does not suggest, recommend or analyze any open pit operations. As stated in the PFS Technical Report:

   "The Maturi and Maturi Southwest deposits are planned to be mined using a combination of two underground mining methods: Post-pillar cut-and-fill (and) Long-hole stoping. These mining methods were selected because they were able to produce at a high throughput rate and had the ability to be adjusted to the specific geometries (dip and thickness) of the deposits." (PFS Technical Report, pg. 1-15)

   "Although a model was undertaken for Maturi Southwest, the assumption in that model was that mining would be by open pit methods, rather than the current underground mine plan. The model remains to be updated for underground mining." (PFS Technical Report, pg. 16-9)

3. The spokesperson for NMW also suggested that the TMM Project has been proven to be economically unviable. This suggestion is also false and does not reflect the independent economic analysis of the PFS Technical Report. In fact, the economic conclusion of the PFS Technical Report states:

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"*Based on the assumptions detailed in this Report, the Project shows a positive financial return and supports the declaration of Mineral Reserves….there is sufficient support from the Report results for progression to a feasibility study."* (PFS Technical Report, pg. 1-37 & pg. 25-10)

4. The spokesperson for NMW further claimed that the TMM Project plans to develop four mineral deposits, including one which, "butts up against the Boundary Waters." In fact, the TMM Project is focused on the development of two mineral deposits, the Maturi and Maturi SW deposits, both of which are several miles from the closest border of the Boundary Waters Canoe Area. In this claim, the NMW spokesperson seems to be referring to the "Spruce Road Deposit," to which Twin Metals does hold lease rights, but is not included in the PFS conceptual plan. As clearly stated in the PFS Technical Report:

   "The PFS assumes that the Maturi and Maturi Southwest deposits will be mined. The PFS does not consider mining the Spruce Road and Birch Lake deposits." (PFS Technical Report, pg. 1-15)

5. Representative Yarusso also asked a question related to the sulphur/sulfide content of the mineralized ore Twin Metals plans to mine and related mine tailings. I indicated that Twin Metals has done extensive metallurgical testing to date, that the results are not yet conclusive, but we are encourage by initial findings. To expand on that answer, the metallurgical work done to-date related to the Twin Metals project is discussed in significant detail in several chapters of the PFS Report, including chapters 10, 13 and 17. Further, information specifically related to the sulfide content of the mine tailings and the potential for the generation of acid rock drainage (ARD) is found in chapter 18:

   "Geochemical Test Work: Tailings samples were collected from the hybrid concentrate tests for chemical characterization and for archival purposes. To provide an initial assessment of the potential for acid rock drainage (ARD), static testing was conducted on two final tailings samples. The chemical composition of the tailings samples was also determined. Kinetic testing of the two tailings samples was initiated in July 2013. The results of the geochemical characterization are summarized as follows:

   - *The acid–base accounting (ABA) results indicate that the* ***final hybrid tailings are unlikely to generate ARD.*** *Kinetic testing results also indicate a low to non-existent potential for ARD. The low sulfide content of the tailings and the presence of olivine, which provides neutralization potential, are the primary reasons for this classification."* (PFS Technical Report, pg. 18-11)

Thank you again for the opportunity to address the committee. Twin Metals Minnesota seeks to provide lawmakers and citizens clear, thorough and factual information about the emerging TMM Project and all the steps involved in the extensive project development and environmental review processes. Twin Metals is confident the TMM Project is being developed in a manner that will provide sound and long-term economic opportunity for Northeast Minnesota while protecting Minnesota's precious environment and natural resources. We encourage all interested parties to visit the Twin Metals Minnesota website at: www.twin-metals.com to learn more about the TMM Project and monitor development activities.

Sincerely,

Bob McFarlin
Vice President, Public and Government Affairs
Twin Metals Minnesota

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