May 29, 2013

Wisconsin Department of Natural Resources
Mining Coordinator – WA/5
101 South Webster Street
PO Box 7921
Madison, WI 53707-7921

Dear Director:

Re: Exploration License
Wisconsin Statutes 295.44
Response to Comments

This office is in receipt of your May 24, 2013 letter which requested additional information for the Exploration License Application. The responses for each item are shown in italics:

1. Submit documentation from the entities that own the land indicating that Gogebic Taconite, LLC has been granted right of entry for purposes of conducting the exploration activities. Also, include a statement from each landowner indicating their concurrence with the proposed reclamation procedures on the land and the intent to keep all access roads in place following completion of the exploration activities.

   RESPONSE: Refer to the letters from the landowners: LaPointe Iron Company, Chester Company, Limited and RGGS Land & Minerals, Ltd., L.P.

2. Specify which EZ-Mud product is proposed to be used in the drilling process. The list of DNR-approved drilling additives includes three different EZ-Mud drilling additives.

   RESPONSE: The drilling contractor has indicated that the following three drilling additives may be used: E-Z Mud Drilling Polymer, E-Z Mud DP and E-Z Mud Gold, all Baroid products. Each product is used to address certain drilling conditions. The E-Z Mud additives listed are all found on the National Sanitation Foundation (NSF) listing of approved drilling additives which have also received approval by Wisconsin DNR for use during the drilling of drinking water wells.

3. The application (p.4) indicates that drilling water could remain in the drilling site sumps for up to 30 days following drilling in order to allow dispersal of the water. Describe measures that will be taken to ensure the sumps do not overtop during this period if there are significant precipitation events during the time the sumps are open.

   RESPONSE: The drilling contractor has indicated that the drill rig has a tank on board that is used to provide water to the drill during drilling activities. This drill rig tank will receive the overflow water from the cuttings tank for reuse. The dugout sump proposed in the earlier submittal would not be required.

   Drilling water will be transported to the Collection Tank Central Location within the Cuttings Tank for dispersal. A revised Typical Site Plan is provided to illustrate the piping arrangement.
4. The application (p.4) proposes that the sump at the Collection Tank Central Location will have minimum dimensions of 40'x40'x4'. Please provide the estimated maximum dimensions of this sump. Also, specify how long water will be allowed to remain in the central sump before it is transported to a wastewater treatment facility.

**RESPONSE:** A dimensional sketch is provided to illustrate the dimensions of the sump and the general arrangement of the construction details. The sump size will be a minimum excavation of 20 feet wide by 20 feet long by 3 feet deep. The sump will be provided with a minimum of 12 inches of freeboard (measured from the top of the crest of the structure to the top of the water elevation). This will allow the collection of any precipitation without overtopping the sump.

The maximum size of the drilling sump will be no more than 40' X 40' X 4' deep. 20% greater than the proposed dimensions.

The sump will be allowed 30 calendar days from the date of the last drilling water to enter the sump to disperse the drilling water. If the drilling water does not disperse, the drilling water will be transported off the project to a municipal wastewater treatment plant for disposal. The dispersal sump would then be backfilled and reclaimed.

5. Please describe any measures that will be taken to ensure the drilling water does not pose a threat to water resources. Include any protocols that will be followed in instances where the borehole penetrates geologic units that contain sulfide minerals in excess of regional background values or units that are known to contain higher sulfide values such as portions of the Tyler Formation and the Yale Member of the Ironwood Formation.

**RESPONSE:** One of the reasons for drilling this set of exploration holes is to collect data to answer the speculation that the pyrite in the area has the potential to produce adverse environmental conditions such as acid mine drainage.

As a precaution, during drilling of strata with suspected higher pyrite concentration (specifically the Tyler Slate and the Yale member of the Ironwood Formation), drill water will be tested for pH with a pH meter and the results recorded. The drill water will be tested prior to drilling into the suspected strata and recorded. Testing will be performed after the strata has been drilled. If the tests indicate that the drilling water pH is less than 6.0 standard units, the drilling water will be treated with approved drilling additives (soda ash or lime) to raise the pH above 6.0 standard units.

Water testing documentation will be available to DNR at the site upon request. Documentation of all pH testing will be provided to DNR with the abandonment reports.

6. The application indicates the drillholes will be temporarily abandoned for some time prior to final grouting. Do you anticipate needing to re-enter all of the drilling sites with the drilling rig to complete the permanent abandonment or will you use more portable grouting equipment?

**RESPONSE:** All drillholes will be reentered with a drillrig to complete the permanent abandonment.

7. The application (p.6) describes a process for removal and stockpiling of topsoil if it is present at a given drilling site. Will the stockpiled material be stored within the footprint of the drilling site as depicted in the "Typical Site Plan" schematic included in the application? Provide additional detail describing how the topsoil will be stabilized or contained to minimize soil loss.

**RESPONSE:** Topsoil will be stockpiled within the footprint of the drilling site by placing it within the berm or by stockpiling at one side of the site. The topsoil will be seeded and mulched to provide a protective vegetative cover. The topsoil may also be covered with tarp if vegetative conditions are not favorable, such as those conditions found during the winter months.
8. The application describes the access roads and anticipated road maintenance activities related to ensuring the roads are maintained in a passable condition. In addition to those measures prescribed in the application, describe other routine erosion control measures, such as placement of silt fence along the road, which will be implemented in order to minimize sedimentation.

RESPONSE: This application has focused on utilizing existing roads and disturbances. Additional erosion control measures to minimize sedimentation that may be used include:

- Installation of silt fence;
- Use of hay bale dikes to trap sediments;
- The use of quick cover crops to establish vegetation on exposed soils;
- Installation of temporary timber mats to isolate the vehicular traffic from the drainage;

9. The access route to the proposed drilling sites along Access Road No.3 is not clear. This is especially the case in the area near the drainageway that flows through the existing culvert as marked on the Site Map. Please provide a specific description of the route which will be used to travel between site 706-2 and the four drilling sites on Access Road No.3. Will any of the trucks and equipment needed for the exploration activity enter the site from Moore Park Road?

RESPONSE: Access Road No. 3 has 2 distinct areas where a drainage is crossed. The location is between proposed drill sites 706-1 and 726-1. The northern road with the existing culvert is the preferred route to be taken. If the circumstances dictate that the culvert crossing is unusable, the more southernly route can be activated with the use of a timber mat to cross the drainage.

Access from Moores Park Road may be the preferred route of travel for the more eastern hole locations. In as much, the access route is shown on the mapping originating from Moores Park Road.

PROPOSED SEQUENCE OF DRILLING

The general drilling sequence will follow:

674-2 will be the first location and will include the construction of the Central Drill Cuttings Location; The next locations will be 646-3 and 608-2.

The eastern sites will be sequenced based on the site conditions and will generally follow 706-2, 706-1, 726-1, 148R and 746-1.

DRILL CUTTINGS DISPOSAL DOCUMENTATION

Documentation from the landfill accepting the drill cuttings will be provided to DNR.

If there are any questions concerning this matter, please phone this office at (715) 561-2601.

Sincerely,

[Signature]

Timothy J Myers
Engineer

GOGEBIC TACONITE, LLC 402 SILVER STREET HURLEY, WI 54534 (715) 561-2601
May 29, 2013

Wisconsin Department of Natural Resources
Mining Coordinator – WA/5
101 South Webster Street
PO Box 7921
Madison, WI 53707-7921

Dear Director:

Re: Gogebic Taconite, LLC
   Exploration License
   Right of Entry

This letter serves to inform your agency that through the Option Agreement signed by RGGS Land & Minerals, LTD., L.P. and Gogebic Taconite, LLC, the right to access the Optioned Lands and the right to perform Exploration and Environmental Studies on the Optioned Lands has been granted to Gogebic Taconite, LLC.

The Optioned Lands include parcels in the following areas of Iron County, Wisconsin:
   Sections 31, 32 and 33, Township 45 North, Range 1 West.
   Sections 5 and 6, Township 44 North, Range 1 West.

The Optioned Lands include parcels in the following areas of Ashland County, Wisconsin
   Sections 1, 2, 11 and 12, Township 44 North, Range 2 West.

The various roads that would be used in the Exploration Activity are used for timber harvesting operations on the property. These roads are to be left in place for future activities. The proposed reclamation of drill sites and roads as described in Gogebic Taconite, LLC’s Exploration License application meets the requirements of RGGS Land & Minerals, LTD., L.P., the land owner.

Terry Villa
RGGS Land & Minerals, LTD., L.P.
PO Box 1266
Virginia, MN 55792
May 29, 2013

Wisconsin Department of Natural Resources
Mining Coordinator - WA/5
101 South Webster Street
PO Box 7921
Madison, WI 53707-7921

Re: Gogebic Taconite, LLC – Exploration License & Right of Entry

Dear Director:

This letter serves to inform your agency that through the Option Agreement signed by LaPointe Iron Company and Gogebic Taconite, LLC, the right to access the Optioned Lands and the right to perform Exploration and Environmental Studies on the Optioned Lands has been granted to Gogebic Taconite, LLC.

The Optioned Lands include parcels in the following areas in Iron County, Wisconsin:

Township 45 North, Range 1 West, Sections 28 and 33

The Optioned Lands include parcels in the following areas in Ashland County, Wisconsin

Township 44 North, Range 2 West, Sections 1, 2, 11 and 12;

The various roads that would be used in the Exploration Activity are used in timbering operations on the property. These roads are to be left in place for future activities. Therefore, the proposed reclamation of the drill sites and roads as remaining in the road system on the property meets the requirements of LaPointe Iron Company, the land owner.

Sincerely,

[Signature]

David C. Adams, President
LaPointe Iron Company
May 29, 2013

Wisconsin Department of Natural Resources
Mining Coordinator – WA/5
101 South Webster Street
PO Box 7921
Madison, WI 53707-7921

Re: Gogebic Taconite, LLC – Exploration License & Right of Entry

Dear Director:

This letter serves to inform your agency that through the Option Agreement signed by Chester Company, Limited and Gogebic Taconite, LLC, the right to access the Optioned Lands and the right to perform Exploration and Environmental Studies on the Optioned Lands has been granted to Gogebic Taconite, LLC.

The Optioned Lands include parcels in the following areas in Iron County, Wisconsin:

    Township 44 North, Range 1 West, Sections 5 and 6

The various roads that would be used in the Exploration Activity are used in timbering operations on the property. These roads are to be left in place for future activities. Therefore, the proposed reclamation of the drill sites and roads as remaining in the road system on the property meets the requirements of Chester Company, Limited, the land owner.

Sincerely,

[Signature]

David C. Adams, President
CMMI, General Partner of Chester Company, Limited