Exhibit A

Matt Ehling President Public Record Media 2375 University Ave W. Suite 200 St. Paul MN, 55114



November 21, 2013

Department of the Interior Office of the Solicitor 1849 C Street, N.W. MS-6556 MIB Washington, DC 20240

RE: Freedom of Information Act request

Dear FOIA staff,

I am making a request for access to public information under the Freedom of Information Act (5 U.S.C. 552).

Through this request, I am seeking copies of the following records created, received, transmitted, or maintained by your agency between January 1, 2012 and November 20, 2013:

- 1. Any and all correspondence (in written or electronic form) between your agency and representatives or employees of Polymet Mining Corp, Glencore International AG, Twin Metals Mining Minnesota, Duluth Metals Limited, or Antofagasta PLC, regarding plans or proposals (in any stage, including pre-feasibility studies) to construct, site, or otherwise locate mining operations inside of, or within 100 miles of, the Boundary Waters Canoe Area Wilderness administered by the US Forest Service (BWCAW);
- 2. Any and all internal agency correspondence (in written or electronic form) regarding plans or proposals (in any stage, including pre-feasibility studies) to construct, site, or otherwise locate mining operations inside of, or within 100 miles of, the BWCAW;
- 3. Any and all internal agency correspondence (in written or electronic form) regarding any proposed "land exchange" related to plans or proposals to construct, site, or otherwise locate mining operations inside of, or within 100 miles of, the BWCAW.

In order to help you determine my status for the purpose of assessing fees, you should know that this request is made as part of news gathering, and is not for commercial use. Responsive files will be shared with researchers, journalists, and the public, and will not be licensed for profit.

I am seeking a waiver of fees for this request, since the public dissemination of the requested materials will aide the public's understanding of your agency's evaluation of proposed mining activities in or near the BWCAW, which have been matters of significant public discussion within the state of Minnesota.

If my fee waiver is denied, I am willing to pay fees of up to \$100.00 without prior notice. If fees are estimated to exceed this amount, please notify me first.

If this request is denied in whole or in part, please notify me of the legal basis for the denial, as well as all appeals procedures available under law.

I can be contacted at 651-335-2037 or info@publicrecordmedia.com if you need to discuss any aspect of this request.

Sincerely,

Matt Ehling

President, Public Record Media

Exhibit B

Matt Ehling President Public Record Media 2375 University Ave. W. Suite 200 Saint Paul, MN 55114

January 8, 2014

Department of the Interior Office of the Solicitor 1849 C Street, N.W. MS-6556 MIB Washington, DC 20240

RE: FOIA ADMINISTRATIVE APPEAL

Dear FOIA official.

On November 21, 2013, I submitted a Freedom of Information Act (5 U.S.C. § 552) request to the US Department of the Interior, Office of the Solicitor. The request was sent via certified mail, and it sought the following information:

- 1. Any and all correspondence (in written or electronic form) between your agency and representatives or employees of Polymet Mining Corp, Glencore International AG, Twin Metals Mining Minnesota, Duluth Metals Limited, or Antofangasta PLC, regarding plans or proposals (in any stage, including prefeasibility studies) to construct, site, or otherwise locate mining operations inside of, or within 100 miles of, the Boundary Waters Canoe Area Wilderness administered by the US Forest Service (BWCAW):
- 2. Any and all internal agency correspondence (in written or electronic form) regarding plans or proposals (in any stage, including pre-feasibility studies) to construct, site, or otherwise locate mining operations inside of, or within 100 miles of, the BWCAW;
- 3. Any and all internal agency correspondence (in written or electronic form) regarding any proposed "land exchange" related to plans or proposals to construct, site, or otherwise locate mining operations inside of, or within 100 miles of, the BWCAW.

The request was submitted as a part of news gathering. In it, I requested a waiver of fees, since disclosure of the requested information would contribute significantly to the public's understanding of the your agency's evaluation of proposed mining activities in

or near the BWCAW. In addition, I set a limit on the amount of fees that I would be willing to pay without prior notice, if my waiver was denied. For reference, a copy of the original request is attached to this correspondence.

Expiration of twenty-day statutory response time

5 U.S.C. § 552(6)(A)(i) requires federal agencies to make a determination about the release of information requested via the FOIA within twenty business days, and also to notify the requester of that determination. Over twenty business days have elapsed.

Notice of unusual circumstances impacting response time

5 U.S.C. § 552(6)(B)(i) allows for an up to ten-day extension of the normal twenty-day response time due to "unusual circumstances" as described in 5 U.S.C. § 552(6)(B)(iii). Such an extension requires the agency to provide written notification of the extension. No such written notice was provided.

Administrative review sought

I am seeking administrative review of your agency's failure to respond to my FOIA request of November 21, 2013. My right to administrative review is established by the FOIA, and by your agency's appeals procedures as set described in 43 CFR Part 2, Subpart D.

Constructive denial is basis for administrative review

As of the date of this writing, your agency has not provided a determination related to my request. As such, your agency has engaged in constructive denial of my request. This action by your agency forms the basis for my administrative appeal.

Time frame for administrative appeal

As noted in your agency's administrative appeals procedures, a requestor may file an administrative appeal after the time limit for responding to the request has passed. I have filed this administrative appeal after the expiration of all applicable statutory time frames.

Result sought

Through the administrative appeal process, I am seeking to receive copies of all documents responsive to the categories outlined in my original FOIA request of November 21, 2013. I can be contacted with any questions related to this request at 651-335-2037, or at info@publicrecordmedia.com.

Sincerely.

Matt Ehling

President, Public Record Media

Exhibit C

JT Haines Special Counsel Public Record Media 2375 University Ave W. Suite 200 St. Paul, MN, 55114

April 30, 2014

US Department of the Interior Office of the Solicitor Lance Purvis (Acting) MS-6429, MIB 1849 C Street, NW Washington, DC 20240

Dear Mr. Purvis,

I am writing on behalf of Public Record Media (PRM) in regards to PRM's November 21, 2013, FOIA request to the US Department of the Interior pertaining to certain mining proposals in Minnesota, and our subsequent Administrative Appeal dated January 8, 2014. Copies of the request and appeal are attached for your reference.

PRM has not received a response of any kind from the Department of the Interior or any division thereof concerning its lawful request for public information. PRM's January 8 Administrative Appeal was timely filed under 5 USC 522(6)(A) and remains outstanding. Following the statutory twenty days from filing, PRM was deemed to have exhausted its administrative remedies.

Given the importance of the underlying issue to the public, we would appreciate prompt information regarding delivery intentions. Please be advised that PRM submitted similar FOIA requests to US ACE, US EPA, and USFS, each of which has delivered responsive records.

Thank you.

JT Haines

Special Counsel, Public Record Media

Exhibit D

Department of the Interior Office of the Solicitor Attn: FOIA Appeals Office 1849 C Street, N.W. MS-6556 MIB Washington, DC 20240

Email: FOIA.Appeals@sol.doi.gov

JT Haines, Special Counsel Public Record Media 2375 University Avenue West #200 Saint Paul, MN 55114 Telephone: (612) 743-7781

Email: jthaines@publicrecordmedia.com

July 3, 2014

RE: Public Record Media FOIA request and appeal

Dear DOI FOIA Responsible Authority or Designee:

I am writing in my capacity as legal counsel for Public Record Media (PRM) in connection with PRM's FOIA request to US Department of the Interior (DOI) dated November 21, 2013, and subsequent Administrative Appeal dated January 8, 2014.

Please be advised that as of today's date, PRM has not received the requested data nor a response of any kind from DOI to its request or appeal. PRM's January 8 appeal was timely filed under 5 USC 522(6)(A) and remains outstanding. Following the statutory twenty days from filing, PRM was deemed to have exhausted its administrative remedies concerning the underlying FOIA request.

As you may be aware, the requested data is of significant interest to the Minnesota public in connection with ongoing nonferrous mining proposals. Notably, PRM has received public data from each of US EPA, USFS, US ACE, MN PCA and MN DNR under similar requests -- US DOI being the only remaining agency that has failed to respond. Please advise as to your delivery intentions concerning the requested data promptly. Thank you in advance for your swift response.

Regards,

JT Haines Special Counsel, Public Record Media www.publicrecordmedia.org



Exhibit E



PRM DOI FOIA Follow Up #3

JT Haines < jthaines@publicrecordmedia.com > To: FOIA.Appeals@sol.doi.gov Cc: Matt Ehling < info@publicrecordmedia.com >

Dear DOI FOIA Responsible Authority or Designee:

Matt Ehling <info@publicrecordmedia.com>

Fri, Aug 15, 2014 at 12:42 PM

I sent a certified letter to the DOI FOIA Appeals Office at 1849 C Street on July 3, 2014, regarding my client Public Record Media's FOIA request dated November 21, 2013, and subsequent Administrative Appeal dated January 8, 2014. The July 3 letter, which inquired as to the status of DOI's response and document delivery schedule, was in addition to a letter on April 30, 2014 to Mr. Lance Purvis which also inquired as to DOI's response and delivery schedule.

http://www.publicrecordmedia.org/wpcontent/uploads/2014/07/FOIAUSDOI2013_pd_004.pdf

http://www.publicrecordmedia.com/wpcontent/uploads/2014/05/FOIAUSDOI2013_pd_003.pdf

Neither I nor my client has received any response to PRM's initial request, the appeal, any followup communication, or any explanation regarding DOI's failure to meet its legal obligations under FOIA.

The data requested is of significant interest to the Minnesota public on ongoing mining proposals. PRM has now received public data from each of US EPA, USFS, US ACE, MN PCA and MN DNR under similar requests within a similar timeframe.

To avoid the necessity of legal action, please advise as to DOI's intent to cure its ongoing violation of FOIA by Tuesday, August 19.

Regards,

JT Haines

JT Haines Special Counsel, Public Record Media (612) 7437781 jthaines@pubicrecordmedia.com www.publicrecordmedia.org