

ROBINS  KAPLAN LLP

800 LASALLE AVENUE
SUITE 2800
MINNEAPOLIS MN 55402

612 349 8500 TEL
612 339 4181 FAX
ROBINSKAPLAN.COM

SIOBHAN M. JAMSA
612 349 0937 TEL
SJAMSA@ROBINSKAPLAN.COM

September 16, 2019

Via E-Mail kaalexander@blm.gov

Keiosha Alexander, Acting FOIA Officer
Bureau of Land Management
ATTN: FOIA Office (WO-640)
1849 C St. N.W.
Washington, DC 20240

Re: FOIA Request for Documents Relating to Pending and Withdrawn
TMM Federal Hardrock Mineral Applications within the Superior
National Forest

Dear BLM FOIA Officer:

This is a request for documents under the Freedom of Information Act, 5 U.S.C. § 552. The requested documents generally relate to the 26 pending and 7 withdrawn Federal Hardrock Mineral Applications within the Superior National Forest attributable to Twin Metals Minnesota LLC ("TMM") as identified on pages 34 and 35 of the Bureau of Land Management's Final Environmental Assessment for the Addition of Terms and Conditions for the Renewal of Hardrock Leases, MNES 01352 and MNES 01353 issued May 2019 and as posted to the BLM's ePlanning page for Hardrock Mineral Applications with the Superior National Forest, MN on May 15, 2019 (Exhibit A).

Requests

Pursuant to the Freedom of Information Act, please provide the following documents in hardcopy or electronic Adobe Acrobat (.pdf) format.

Request 1: Copies of all pending and withdrawn TMM applications listed in Exhibit A other than MNES 01352 and MNES 01353.

Request 2: Copies of all correspondence and documents related to the pending and withdrawn TMM applications listed in Exhibit A, other than MNES 01352 and MNES 01353, including but not limited to: (a) correspondence between the BLM and applicant(s) concerning the status of the applications, (b) environmental assessments, (c) proposed stipulations, (d) plans of operation, (e) plans of exploration, and (f) plans of studies.

September 16, 2019
Page 2

Via E-Mail kaalexander@blm.gov

Fee Waiver

Our firm represents the Friends of the Boundary Waters (Friends), a 501(c)(3) non-profit organization, and this request is being made on their behalf. Because this request is being made on behalf of the Friends, we are requesting a fee waiver for the BLM's response to this FOIA request. As a non-profit, the Friends has no commercial interest in the documents and responsive documents are likely to provide an increase of public understanding with respect to the BLM's permitting process.

Should the BLM deny the foregoing request for a fee waiver, we are willing to pay up to a maximum of \$150 in fees. In the event you anticipate fees to exceed this limit, please contact me before processing the full scope of the request. I can be reached during business hours by phone at 612-349-0937, or by email at SJamsa@RobinsKaplan.com.

If you have any questions regarding this request, or wish to discuss this request, or any of the specific documents and materials requested above, please contact me at the previously provided phone number or email address.

Sincerely,



Siobhan M. Jamsa

Encl. (Ex. A - Pending Federal Hardrock Mineral Applications, as posted at <https://eplanning.blm.gov/epl-front-office/projects/nepa/118527/172787/209932/>)

PENDING FEDERAL HARDROCK MINERAL APPLICATIONS
Within the Superior National Forest, Minnesota
As of May 13, 2019

SERIAL NUMBER	LAND USE REQUEST	COMPANY	STATUS
MNES 01352	Lease Renewal	Franconia Minerals (US) LLC (TMM)	EA posted on ePlanning for 41-day public comment period; BLM conducting comment content analysis.
MNES 01353	Lease Renewal	Franconia Minerals (US) LLC (TMM)	EA posted on ePlanning for 41-day public comment period; BLM conducting comment content analysis.
MNES-57965	Preference Right Lease Application	Twin Metals Minnesota LLC [encompassing prospecting permits MNES 50652 (865.78 acres) and MNES 50846 (178.45 acres)]	BLM reviewing application; NEPA not started.
MNES-50264	Preference Right Lease Application	Franconia (now TMM; formerly Lehmann Exploration; 13.75 acres)	BLM reviewing application; NEPA not started.
MNES-57274	Preference Right Lease Application	Encampment (encompassing prospecting permit MNES-50817; 320.28 acres)	BLM reviewing application; NEPA not started.
MNES-53731	Prospecting Permit Extension Request	Lehmann Exploration Management, Inc. (TMM)	Pending
MNES-53868	Prospecting Permit Extension Request	Duluth Metals (TMM)	Pending
MNES-54037	Prospecting Permit Extension Request	Duluth Metals (TMM)	Pending
MNES-54050	Prospecting Permit Extension Request	Twin Metals Minnesota LLC	Pending
MNES-54194	Prospecting Permit Extension Request	Twin Metals Minnesota LLC	Pending
MNES-54195	Prospecting Permit Extension Request	Twin Metals Minnesota LLC	Pending
MNES-54196	Prospecting Permit Extension Request	Twin Metals Minnesota LLC	Pending
MNES-54366	Prospecting Permit Extension Request	Duluth Metals (TMM)	Application withdrawn
MNES-54367	Prospecting Permit Extension Request	Duluth Metals (TMM)	Application withdrawn
MNES-54368	Prospecting Permit Extension Request	Duluth Metals (TMM)	Application withdrawn
MNES-54385	Prospecting Permit Extension Request	Duluth Metals (TMM)	Pending
MNES-54387	Prospecting Permit Extension Request	Lehmann Exploration Management, Inc. (TMM)	Pending
MNES-55203	Prospecting Permit Extension Request	Duluth Metals (TMM)	Pending
MNES-55205	Prospecting Permit Extension Request	Duluth Metals (TMM)	Pending
MNES-55206	Prospecting Permit Extension Request	Duluth Metals (TMM)	Pending
MNES-55301	Prospecting Permit Extension Request	Lehmann Exploration Management, Inc. (TMM)	Pending
MNES-55302	Prospecting Permit Extension Request	Lehmann Exploration Management, Inc. (TMM)	Pending
MNES-55305	Prospecting Permit Extension Request	Twin Metals Minnesota LLC	Pending

**PENDING FEDERAL HARDROCK MINERAL APPLICATIONS
 Within the Superior National Forest, Minnesota
 As of May 13, 2019**

MNES-55306	Prospecting Permit Application	Lehmann Exploration Management (TMM)	BLM reviewing application; NEPA not started.
MNES-56284	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56285	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56286	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56287	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56288	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56289	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56290	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56291	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56292	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56293	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56294	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56295	Prospecting Permit Application	Park Creek Exploration	BLM reviewing application; NEPA not started.
MNES-56443	Prospecting Permit Application	Encampment	BLM reviewing application; NEPA not started.
MNES-57185	Prospecting Permit Application	Duluth Metals (TMM)	Application withdrawn 2/8/2019
MNES-57186	Prospecting Permit Application	Duluth Metals (TMM)	Application withdrawn 2/8/2019
MNES-57187	Prospecting Permit Application	Duluth Metals (TMM)	Application withdrawn 2/8/2019
MNES-57188	Prospecting Permit Application	Duluth Metals (TMM)	Application withdrawn 2/8/2019
MNES-57828	Prospecting Permit Application	Duluth Metals (TMM)	BLM reviewing application; NEPA not started.
MNES-57276	Prospecting Permit Application	Encampment	BLM reviewing application; NEPA not started.
MNES-57410	Prospecting Permit Application	Duluth Metals (TMM)	BLM reviewing application; NEPA not started.
MNES-57601	Prospecting Permit Application	Beaver Bay (TMM)	BLM reviewing application; NEPA not started.
MNES-57681	Prospecting Permit Application	Beaver Bay (TMM)	BLM reviewing application; NEPA not started.
MNES-57765	Prospecting Permit Application	Franconia Minerals (TMM)	BLM reviewing application; NEPA not started.
MNES-58222	Prospecting Permit Application	Franconia Minerals (US) LLC (TMM)	BLM reviewing application; NEPA not started.