

*In the Matter of the Application for the
NorthMet Project Permit to Mine
Dated December 2017*

EXHIBIT 4

TO

REQUEST TO COMMISSIONER

TO DENY AMENDMENT TO

PERMIT TO MINE APPLICATION

1 So all we did when we filed our change
2 was just to inform the parties of it and the
3 Administrative Law Judge that the party named in
4 DNR's hearing as PolyMet is now known as New Range
5 Copper Nickel, LLC.

6 JUDGE LAFAVE: Thank you.

7 Mr. Katchen, what does the Department --
8 what's the Department's view?

9 MR. KATCHEN: The Department's view is
10 that we don't believe the conversion statute allows
11 New Range to automatically step into PolyMet
12 Mining's corporate shoes and become a party to the
13 permit to mine, the permit to mine application.

14 The conversion statute that Mr. Johnson
15 cited only applies to assets, property contracts,
16 and liabilities. A permit to mine, a permit to mine
17 application is none of these, it is a regulatory
18 approval that should be respected. Thus, we believe
19 New Range will have to go through the right
20 regulatory process to be added on as a permittee.

21 That said, DNR sees no reason to delay
22 this hearing because PolyMet Mining Corporation was
23 also on the permit, so there were two PolyMet
24 entities that were on the permit to mine, and if
25 litigated they'd be issues before the Court of