



December 23, 2025

Eric Quigley, Director of Exploration  
GreenLight Metals  
220 W Washington St, Suite 310  
Marquette, MI 49855  
(sent electronically)

Subject: Notice of Intent Submission Request for Additional Information

Dear Eric Quigley:

The Wisconsin Department of Natural Resources (DNR) received the Notice of Intent (NOI) to drill from GreenLight Wisconsin (GLW) on December 2, 2025. The NOI and supporting information were posted on the DNR [webpage](#) on December 4, 2025. As provided under s. NR 130.109(3), Wis. Adm. Code, the information specified below must be provided in order for the DNR to complete its review of the NOI, determine whether any additional approvals or permits are needed, and ultimately issue a decision pursuant to s. NR 130.109(4), Wis. Adm. Code. The DNR's informational requests are organized to correspond to the required elements of an NOI, as delineated in s. NR 130.109(1), Wis. Adm. Code. To satisfy the additional information request, please amend the NOI to include details that address all of the bulleted items below:

*(a) A legal description of the parcels where the exploration will take place, including identification of land ownership and maps showing the approximate drilling site locations and anticipated site access routes.*

- Clarify the proposed timeframe for initiating the winter program. There is an inconsistency on page 1 of the exploration plans.
- Provide details on subsurface borehole tracking while drilling to ensure all drillholes remain within the extents of the Soo Line 40 mineral parcel.
- Review the submittal and ensure the estimates of proposed ground disturbance are consistent and accurate. The total area for 15 drill sites at 50 ft x 70 ft equals 1.205 acres, while the text in Section 4.5 indicates that the drill site disturbance will be 1.16 acres. Similarly, reassess the acreages for access route land disturbances.

*(b) A description of the means and methods that will be used for the exploration, including drilling methods, anticipated drillhole locations, diameter, and depth, source of drilling water, and anticipated use of drilling additives, if any.*

- Section 4.4 of the NOI lists two types of drilling through the overburden and details the method utilized in 2025. Confirm the primary drilling method planned for the 2026 program for the casing and drill rods.
- Provide more detail on the installation of the HQ diameter casing, including the primary geologic material anticipated to be encountered, the method of installation including drill bit/casing shoe/drillhole diameter, more detail on the use of bentonite, how cuttings are flushed from the hole

during casing installation, the estimated depth per hole, the determination that the surrounding aquifer is sealed off, etc.

- Provide an estimated average daily water withdrawal amount for the 2026 program. Ensure to account for the use of up to 3 drill rigs.
- Describe the rationale behind the stated maximum water withdrawal rate of 12,000 gallons/day.
- Confirm that the screened intake will not interact with the bed of the waterway.

*(c) A description of drilling site access and site preparation needed to accommodate the drilling activity, including site grading and stabilization methods.*

- Describe the process of assessing 'frozen ground conditions.'
- How often will 'frozen ground conditions' be assessed throughout the program?
- Will the access routes and drill sites be plowed to drive down the frost? If so, when will this occur?

*(d) A description of how any diversion, retention, or drainage of water, including stormwater, drilling water, and water from flowing drillholes, on or around the drilling site will be conducted.*

- If a sump will be utilized for more than one drillhole and the depths of the drillholes have not been determined, explain how the sump will be sized to have adequate capacity for drilling fluids and cuttings from multiple drillholes.
- Provide a schematic of the centrifuge method of cuttings management identified as an alternative in the submittal.

*(e) A description of how drilling mud, drill cuttings, any pollutant-bearing minerals or materials, including fuel, lubricants, and drilling additives, will be handled during exploration and a description of spill prevention, containment and remediation procedures.*

- Provide details on unlined sumps, including where they are proposed, how the size will be determined, how the material will be transported to the sump, etc.
- Clarify how sulfide content will be assessed at the time of drilling to determine if the cuttings will be placed in a lined or unlined sump.
- Describe how the liner will be removed, as it is listed as a method of final sump reclamation.

*(f) A description of drillhole abandonment methodology. The explorer shall conduct the drillhole abandonment procedures in compliance with s. NR 130.111.*

- Provide details on abandonment of unlined sumps, including the cement mixing ratio and method.

*(g) A description of measures that will be taken to remove, stockpile, or otherwise protect topsoil during exploration.*

- Confirm that stockpiled topsoil and other materials will be adequately protected at all times, not just during the winter as suggested in section 4.8.

*(h) A description of methods and materials used to establish temporary vegetative cover, if necessary, to stabilize any part of the drilling sites and measures to control invasive species as a result of the temporary measures.*

- Describe any limitations on completing the restoration of drill sites or access routes under frozen conditions, and how they will be handled.
- Provide details on the identification of infestations of non-native invasive plant species, including whether assessments have already been conducted, who can provide the identification in the field, whether additional inspections are planned, etc.

*(j) A reclamation plan designed to minimize adverse effects to the environment during and after exploration that includes all of the following:*

*4. A description of any nearby wetlands that could be affected by the exploration activity and the measures that will be taken to minimize disturbance to wetlands, including the use of best management practices for construction in or adjacent to wetlands, and relocating or modifying the configuration of drilling sites or restricting exploration activity to the winter months.*

- Provide a copy of the wetland delineation report for field work conducted in 2025.

*5. A total cost estimate for drilling site termination, including unit costs for drillhole permanent abandonment and drilling site reclamation.*

- Provide a recalculated Reclamation Cost Estimate table that includes the following:
  - Itemize \$3.60/foot for unit cost for 'Footage' to include specific costs for materials (cement) and labor per drillhole.
  - Update the 'Manual Site Reclamation/Seeding/Mulching' section with the total disturbance acreage updates previously discussed on page 1.
  - 'Mulch' unit cost and quantity are reversed.

The total bond required under the exploration license will include the total from the Reclamation Cost Estimate table for the 2026 drilling program, as well as the cost of abandoning the 3 temporarily abandoned drillholes from the 2025 drilling program and the 2 temporarily abandoned drillholes at the Reef deposit.

Wetland (Ch. 281, Wis. Stats.) and waterway (Ch. 30, Wis. Stats.) permits will be required for regulated impacts to wetlands outside of frozen conditions. Renewals or amendments to existing coverage for erosion control (s. NR 216, Wis. Adm. Code) and dewatering (Ch. 283, Wis. Stats.) must be obtained before work can commence.

Once all requested information has been received by the DNR, the review process will resume. If you have any questions regarding this additional information request, please contact Molly Gardner at (715) 292-4911 or at [molly.gardner@wisconsin.gov](mailto:molly.gardner@wisconsin.gov).

Sincerely,



Molly Gardner, CPG  
DNR Metallic Mining Coordinator

CC: Matt Filgate, President/CEO, GreenLight Metals  
Steve Donohue, Director, GreenLight Metals  
Megan Luick, Minerals Program Manager, USFS  
Gregory Pils, DNR  
Kyle McLaughlin, DNR