

Exhibit O

Water Requirements

**Sunstone Solar Project
June 2023**

Prepared for



Sunstone Solar, LLC

Prepared by



Tetra Tech, Inc.

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Acronyms and Abbreviations

Applicant	Sunstone Solar, LLC, a subsidiary of Pine Gate Renewables, LLC
Facility	Sunstone Solar Project
gal	gallon
Mgal	million gallons
NPDES	National Pollutant Discharge Elimination System
O&M	operations and maintenance
OAR	Oregon Administrative Rule
ODEQ	Oregon Department of Environmental Quality
ORS	Oregon Revised Statutes

1.0 Introduction

Sunstone Solar, LLC, a subsidiary of Pine Gate Renewables, LLC (Applicant), proposes to construct and operate the Sunstone Solar Project (Facility), a photovoltaic solar energy generation facility and related or supporting facilities in Morrow County, Oregon. This Exhibit O was prepared to meet the submittal requirements in Oregon Administrative Rule (OAR) 345-021-0010(1)(o).

2.0 Water Use

OAR 345-021-0010(1)(o) Information about anticipated water use during construction and operation of the proposed facility. The applicant must include:

(A) A description of the use of water during construction and operation of the proposed facility;

2.1 Construction

Water use for construction is estimated at a maximum of approximately 28.4 to 32.4 million gallons (Mgal) per phase under annual average conditions. As described in Exhibit B, construction phases will overlap, with two phases starting each year. Each phase will last approximately 21 months and water demand will vary based on the specific activity and climate conditions throughout the year (see Figure O-1). Total water demand over the course of the 47-month construction period is estimated at 185.3 Mgal, with a worst-case quantity assumed to be 204 Mgal if work is needed 7 days a week instead of 6 days a week. For the purposes of analysis, construction of each phase is assumed to take approximately 21 months. Water use will be for dust control throughout the construction site, road compaction, mixed into concrete for foundations, and provided for on-site worker drinking and sanitation use (Table O-1). The primary use of water during construction will be for dust control on access roads.¹ The total water use under average conditions assumes that all Facility roads will be watered multiple times each day, even in portions of the proposed Facility where no construction is underway. Water for dust control and road compaction will be applied via tanker truck in a manner that avoids erosion and sediment discharge and is consistent with the best management practices presented in the 1200-C Construction Stormwater National Pollutant Discharge Elimination System Permit (NPDES; see Exhibit I).

For the construction of foundations, the Applicant will buy concrete directly from licensed suppliers (i.e., with a valid water use license) in the area. Thus, the water required for concrete mixing will be

¹ Note that other dust suppressants besides water may be utilized as necessary during extreme drought conditions (synthetic polymer emulsions, chemical suppressants, organic glues, and wood fiber materials) depending on the site and condition (to be applied by trained and certified vendors familiar with applicable environmental regulations including the federal Endangered Species Act, the Clean Water Act, the Salmon Recovery Act, and state and local regulations).

provided by the concrete suppliers under their existing permits. Note that water for concrete production is included in the analysis to represent the worst-case anticipated water needs. Fire prevention represents a minor water use; this will involve stationing a water truck at the job site to keep the ground and vegetation moist during extreme fire risk conditions.

Table O-1. Water Use During Construction

Construction Use	Quantity
Site dust control	150.6 Mgal
Road compaction	7.3 Mgal
Concrete mixing	-
• Battery pad foundations	110,040 gal
• Tracker post foundations	4.8 Mgal
• Transmission line post foundations	9,900 gal
• Inverter/transformer pad foundations	19.0 Mgal
• Collector substations/switchyards foundations	197,040 gal
• O&M building foundations	6,000 gal
<i>Total water for concrete mixing</i>	<i>25.0 Mgal</i>
Drinking water/sanitation	2.5 Mgal
Total	185.3 Mgal

Note that the actual Facility construction will be phased and will be a focused effort on specific portions of the proposed Facility in order to maximize efficiency and limit water use.

Water for road construction assumes 25 gallons (gal) per lineal foot of road. Exhibit B identifies 290,400 feet/55 miles of roads. Water use for dust control assumes an average of 118,700 gal per day over the entire 47-month construction schedule. Actual dust control water use will vary, depending on the timing of construction and the season, precipitation, soil conditions, temperature, and frequency of repeat disturbance. None of these factors can be controlled or easily estimated by the contractor. However, water use for dust control is anticipated to be highest during the summer months, and minimal water is expected to be used during the winter months, as shown on Figure O-1. An average of approximately 3.5 Mgal of water per month will be required for Facility construction dust suppression and road and earthwork compaction.

Concrete mixing for foundations uses a standard assumption of 30 gal of water per cubic yard of concrete. Exhibit G identifies 805,274 cubic yards of concrete needed for foundations and the catchment. Of the total water for concrete mixing, most of it will be for foundations for the inverter/transformer stations (319 total). For drinking and sanitation requirements, it is assumed that approximately 3 gal per day per person will be required for construction workers (average of 682 on-site workers for a 6-day work week).

While water quantities have been conservatively estimated for purposes of analysis, due to the cost and time involved in transporting water by tank truck to the proposed Facility, water used for dust

suppression and road compaction will be applied at the minimum rate necessary to perform its function. Water used for concrete mixing will also be applied at the minimum mixing rate required to make concrete.

2.2 Operation

Once constructed, the proposed Facility will have a limited need for water. Water will be used for drinking water and restrooms at the operations and maintenance (O&M) buildings, equipment rinsing, and for solar panel washing. The battery energy storage system will not require water usage during operations. Total water consumption expected at the four O&M buildings for up to 40 employees during operations is assumed to be approximately 12 gal per day on average with a maximum of 480 gal per day. Equipment rinsing is also anticipated with an average of 50 gal per day and a maximum of 300 gal per day. Thus, the total maximum gal of water required in a year is 168,720 gal.

The solar panels may require periodic washing to minimize the effects of dust and dirt on energy production (referred to as “soiling”) although this is not anticipated and will be dependent on weather conditions; during drought conditions when there is more dust, the panels may require washing. For the purpose of this analysis, it is assumed that all modules will be washed once per year and require 0.2 gal per solar module, for a total of approximately 790,000 gal per year. The use of 790,000 gal per year for this purpose will result in an average daily consumption during operations of approximately 2,532 gal (assuming a 6-day work week). Advancements in robotic panel cleaning have the potential to dramatically reduce the water needs for solar panel washing. Therefore, the Applicant’s estimate likely overestimates the amount of water that will actually be used. Water will be applied via robotic panel cleaners and will not have any acids, bases, or metal brighteners in it; biodegradable, phosphate-free cleaners may be used sparingly. Water usage frequency and consumption rates are based on standard commercial facility estimates.

3.0 Sources of Water

OAR 345-021-0010(1)(o)(B) A description of each source of water and the applicant’s estimate of the amount of water the facility will need during construction and during operation from each source under annual average and worst-case conditions;

3.1 Construction

The Applicant’s third-party construction contractor may obtain construction water from Hermiston Public Works, Stanfield Public Works, or the Port of Morrow (under an existing municipal or quasi-municipal water right) and truck the water to the site or obtain water from local licensed providers. Alternatively, water may be obtained from local landowners or other source that has regulatory approval for construction use. A total conservative water use of approximately 185.3 Mgal will be required for dust control, road compaction, concrete mixing, and drinking water/sanitation uses as discussed above. However, the amount of water applied daily is highly dependent on weather and

will vary between construction periods and duration (see Figure O-1). The highest quantities of water will be used during July and August, when up to 10.8 Mgal per month may be needed. Hermiston Public Works, Stanfield Public Works, and the Port of Morrow have indicated they can provide sufficient water for Facility construction (Table O-2; Attachments O-1 through O-3). During the period of highest demand, water may be sourced from more than one of the potential suppliers listed below.

The quantities available shown in Table O-2 are based on written correspondence from the water suppliers contacted (see Attachments to Exhibit O) and demonstrate that an adequate supply of water for Facility construction is available. The non-binding commitments indicate a supply of up to 19.5 Mgal per month. As stated previously, the actual Facility construction will be a focused effort on specific portions of the proposed Facility in order to maximize efficiency and limit water use.

Table O-2. Potential Water Suppliers

Supplier Name	Contact	Quantity Available (gallons)
Hermiston Public Works	Roy Bicknell	6.5 Mgal per month
Stanfield Public Works	Scott Morris	6.5 Mgal per month
Port of Morrow	Mark Patton	6.5 Mgal per month
TOTAL		19.5 Mgal per month

3.2 Operation

During operation, four new exempt wells will be located near each of the four O&M buildings. Collectively, the wells will provide no more than a total of 5,000 gal per day for use at the O&M buildings.

Water for solar panel washing is anticipated to be obtained from the same sources as during construction or from the exempt wells on site. Additionally, correspondence with Hermiston Public Works, Stanfield Public Works, and the Port of Morrow has confirmed a supply of up to 19.5 Mgal per month will be available, up to 234 Mgal annually, for periodic solar array washing (Attachments O-1 through O-3).

4.0 Wastewater and Water Loss

OAR 345-021-0010(1)(o)(C) A description of each avenue of water loss or output from the facility site for the uses described in (A), the applicant's estimate of the amount of water in each avenue under annual average and worst-case conditions and the final disposition of all wastewater;

4.1 Construction

Water use for concrete production and dust control will result in water loss primarily through evaporation from wetted road surfaces and from curing concrete. No water used on the site will be discharged into wetlands, streams, and other waterways. Due to the dry conditions at the proposed Facility and the relatively low rates of water use and application, it is expected that any excess water used during construction will be lost within or near the proposed Facility site boundary, primarily through evaporation and infiltration.

Construction-related stormwater runoff will be managed according to an NPDES 1200-C permit and the Applicant will follow Oregon Department of Environmental Quality (ODEQ) rules governing construction stormwater runoff. Most of the area within the site boundary is vegetated, which will serve as a buffer to promote infiltration and minimize erosion. Likewise, the Applicant will follow ODEQ rules regarding the disposal of sanitary wastewater and use of portable toilets.

4.2 Operations

Minimal wastewater or water loss will be generated during operations. Wastewater from domestic and incidental uses at the O&M buildings will be discharged to county-approved septic systems located near the O&M buildings. During periodic washing of solar panels (approximately once per year), washwater will evaporate or infiltrate into the ground. Water from this activity will not be discharged into wetlands, streams, or waterways. As indicated above, battery storage will not generate wastewater during operations. Stormwater will also infiltrate into the ground.

5.0 No Groundwater/Surface Water Permit or Water Right Transfer

OAR 345-021-0010(1)(o)(E) If the proposed facility would not need a groundwater permit, a surface water permit or a water right transfer, an explanation of why no such permit or transfer is required for the construction and operation of the proposed facility;

The proposed Facility does not need any groundwater permits, water rights, or surface water permits. As discussed above, water for construction will either be obtained from Hermiston Public Works, Stanfield Public Works, or the Port of Morrow under an existing municipal water right or provided from other licensed providers nearby.

Operations water use will be minimal and most use will qualify as exempt under ORS 537.545(1)(f), which allows use of groundwater for any single industrial or commercial purpose in an amount not exceeding 5,000 gal per day. Exempt industrial water uses include drinking, flushing toilets, using sinks, and other general industrial uses (i.e., solar panel washing). The Applicant expects to rely on exempt wells allowed under ORS 537.545 to provide water to the O&M buildings.

During operations, water will be used to wash the solar panels and maintain the overall efficiency of the panels. Washwater for periodic solar panel washing will be obtained from the same sources

as during construction. If water is obtained from Hermiston Public Works, Stanfield Public Works, or the Port of Morrow, no permit or transfer is required because these entities’ existing municipal / quasi-municipal water rights allow use for industrial purposes such as the proposed Facility (OAR 690-300-0010(29), (40)). If water is obtained from one or more existing or newly constructed wells, the total maximum daily groundwater withdrawal will be less than 5,000 gal per day, as an exempt use for a single industrial or commercial purpose.

6.0 Mitigation Measures

OAR 345-021-0010(1)(o)(G) A description of proposed actions to mitigate the adverse impacts of water use on affected resources.

No adverse impacts are expected to occur from proposed Facility water use during construction or operation. Solar energy facilities have minimal water requirements. Because construction and operation of the Facility will not create any significant impacts on water resources, no mitigation measures are proposed.

7.0 Submittal Requirements and Approval Standards

7.1 Submittal Requirements

Table O-3. Submittal Requirements Matrix

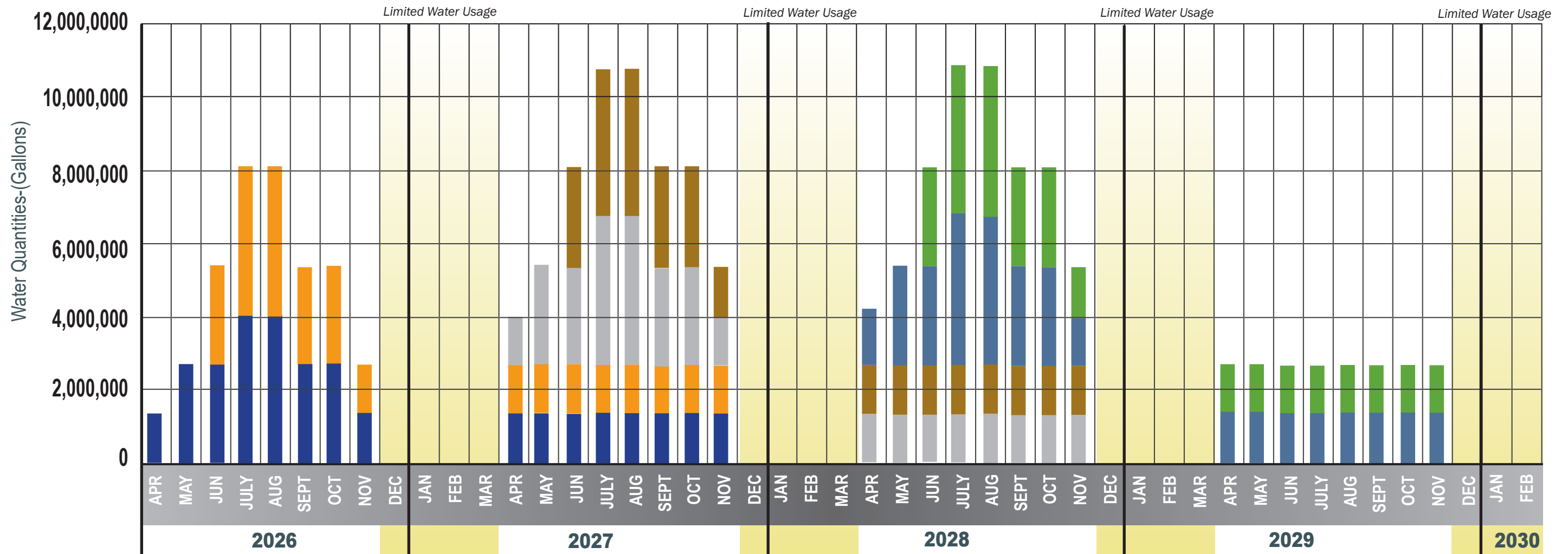
Requirement	Location
OAR 345-021-0010(1)(o) Information about anticipated water use during construction and operation of the proposed facility. The applicant must include:	-
(A) A description of the use of water during construction and operation of the proposed facility;	Section 2.0
(B) A description of each source of water and the applicant’s estimate of the amount of water the facility will need during construction and during operation from each source under annual average and worst-case conditions;	Section 3.0
(C) A description of each avenue of water loss or output from the facility site for the uses described in (A), the applicant’s estimate of the amount of water in each avenue under annual average and worst-case conditions and the final disposition of all wastewater;	Section 4.0
(D) For thermal power plants, a water balance diagram, including the source of cooling water and the estimated consumptive use of cooling water during operation, based on annual average conditions;	N/A
(E) If the proposed facility would not need a groundwater permit, a surface water permit or a water right transfer, an explanation of why no such permit or transfer is required for the construction and operation of the proposed facility;	Section 5.0

Requirement	Location
(F) If the proposed facility would need a groundwater permit, a surface water permit or a water right transfer, information to support a determination by the Council that the Water Resources Department should issue the permit or transfer of a water use, including information in the form required by the Water Resources Department under OAR chapter 690, divisions 310 and 380; and	N/A
(G) A description of proposed actions to mitigate the adverse impacts of water use on affected resources.	Section 6.0

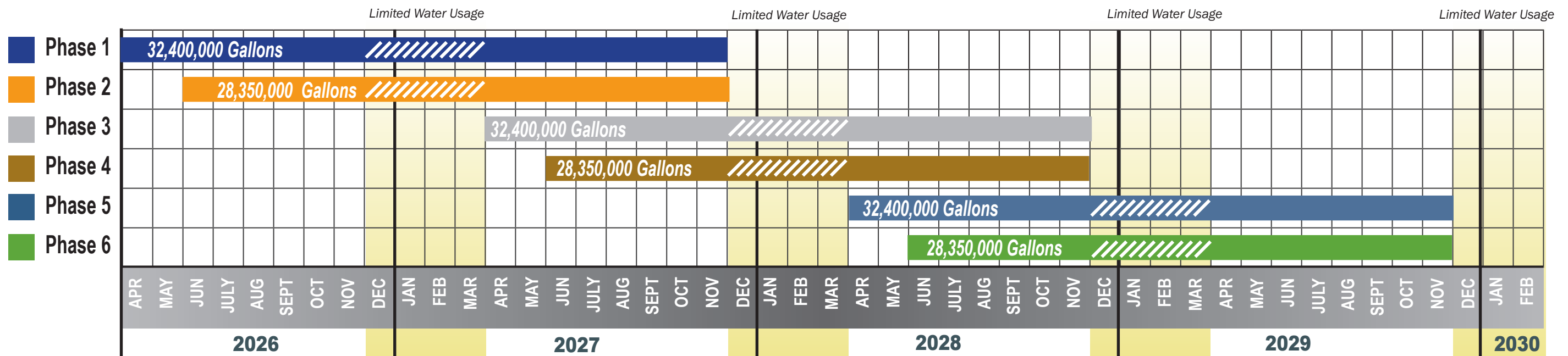
7.2 Approval Standards

OAR 345 Division 22 does not provide an approval standard specific to Exhibit O.

Figure



Construction Water Quantities (Gallons) - Totals



**Attachment O-1: Record of
Correspondence with Hermiston Public
Works Department**

From: [Roy Bicknell](#)
To: [Gulick, Kristen](#); [Alex Mccann](#)
Subject: RE: ATTENTION/RESPONSE REQUESTED: Hermiston Public Work's Consultation Regarding the Echo Solar Project
Date: Monday, January 9, 2023 8:09:21 AM
Attachments: [image004.png](#)

CAUTION: This email originated from an external sender. Verify the source before opening links or attachments.

Kristen

At this point, it appears the City of Hermiston could still provide water for this project.

Thank you~Roy

Roy Bicknell
Water Superintendent
City of Hermiston
541-567-5521



From: Gulick, Kristen <Kristen.Gulick@tetrattech.com>
Sent: Tuesday, January 3, 2023 9:40 AM
To: Alex Mccann <amccann@hermiston.or.us>; Roy Bicknell <rbicknell@hermiston.or.us>
Cc: Roy Bicknell <rbicknell@hermiston.or.us>
Subject: FW: ATTENTION/RESPONSE REQUESTED: Hermiston Public Work's Consultation Regarding the Echo Solar Project
Importance: High

STOP and VERIFY This message came from outside of the City of Hermiston

Hello,
Just checking in on the status of this request. Note that this request is for a different project from the one I contacted you previously about; the Echo Solar Project is nearby the previously discussed project.

Let me know if you have any questions, thanks!

Sincerely,

Kristen Gulick (she/her) | Environmental Planner III | Tetra Tech
Mobile (541) 740-3316 | kristen.gulick@tetrattech.com

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From: Gulick, Kristen

Sent: Monday, December 19, 2022 9:43 AM

To: amccann@hermiston.or.us; rbicknell@hermiston.or.us

Cc: water@hermiston.or.us

Subject: FW: ATTENTION/RESPONSE REQUESTED: Hermiston Public Work's Consultation Regarding the Echo Solar Project

Importance: High

Hello,

I am contacting you on behalf of the proposed Echo Solar Project (Echo Solar). Echo Solar is a proposed 1,250-megawatt solar photovoltaic power generation facility in Morrow County, Oregon owned by Pine Gate Renewables, LLC (Pine Gate). More information on Echo Solar can be found here: <https://www.oregon.gov/energy/facilities-safety/facilities/Pages/ESP.aspx>

Our current, conservative, estimate of water anticipated for facility construction dispersed over a 9 to 12-month period is 6.5 million gallons/month. Tetra Tech is under contract to Pine Gate through the Oregon Dept. of Energy's (ODOE) permitting process. To this end, we will provide to ODOE evidence of consultation with local municipalities that we have been in contact regarding obtaining water for the construction of Echo Solar. At this point in the process, Pine Gate is not required to have entered into a contract with the Hermiston Public Works for water supply, we just need to demonstrate to ODOE that we have been in consultation with the Hermiston Public Works and that yes, you are licensed to supply water to Pine Gate, how much you are able to provide, your water right permit number(s), and any seasonal constraints. Any letter from you to me on this subject does not constitute a contract and you are under no obligation to supply water for the facility, we just need to demonstrate to ODOE that you have water to sell and that we could use as a water supplier if we, at a later date, come to an agreement to do so.

If you could please provide a letter addressing Echo Solar as soon as possible, that would be greatly appreciated. It can be a statement on your letterhead with your signature if you like, or even a reply to this email.

Thank you in advance and let me know if you have any questions!

Sincerely,

Kristen Gulick (she/her) | Environmental Planner II | Tetra Tech
Mobile (541) 740-3316 | kristen.gulick@tetrattech.com

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TETRA TECH

**Attachment O-2: Record of
Correspondence with Stanfield Public
Works Department**

From: [Scott Morris](#)
To: [Gulick, Kristen](#)
Subject: RE: ATTENTION/RESPONSE REQUESTED: Stanfield Public Work's Consultation Regarding the Echo Solar Project
Date: Wednesday, November 23, 2022 9:48:57 AM
Attachments: [image002.png](#)
[SKM_C300i22112309390.pdf](#)

CAUTION: This email originated from an external sender. Verify the source before opening links or attachments.

Kristen,

I have attached our water rights. The gallons per month doesn't look like a problem. We don't have any seasonal constraints.

Thank you

Scott Morris
Public Works Director
City of Stanfield
541-561-8292

From: Gulick, Kristen [mailto:Kristen.Gulick@tetrattech.com]
Sent: Tuesday, November 22, 2022 12:13 PM
To: smorris@cityofstanfield.com; tmorris@cityofstanfield.com
Cc: citymanager@cityofstanfield.com
Subject: ATTENTION/RESPONSE REQUESTED: Stanfield Public Work's Consultation Regarding the Echo Solar Project

Hello,

I am contacting you on behalf of the proposed Echo Solar Project (Echo Solar). Echo Solar is a proposed 1,250-megawatt solar photovoltaic power generation facility in Morrow County, Oregon owned by Pine Gate Renewables, LLC (Pine Gate). More information on Echo Solar can be found here: <https://www.oregon.gov/energy/facilities-safety/facilities/Pages/ESP.aspx>

Our current, conservative, estimate of water anticipated for facility construction dispersed over a 9 to 12-month period is 6.5 million gallons/month. Tetra Tech is under contract to Pine Gate through the Oregon Dept. of Energy's (ODOE) permitting process. To this end, we will provide to ODOE evidence of consultation with local municipalities that we have been in contact regarding obtaining water for the construction of Echo Solar. At this point in the process, Pine Gate is not required to have entered into a contract with the Stanfield Public Works for water supply, we just need to demonstrate to ODOE that we have been in consultation with the Stanfield Public Works and that yes, you are licensed to supply water to Pine Gate, how much you are able to provide, your water right permit number(s), and any seasonal constraints. Any letter from you to me on this subject does not constitute a contract and you are under no obligation to supply water for the facility, we just need to demonstrate to ODOE that you have water to sell and that we could use as a water supplier if we, at a later date, come to an agreement to do so.

If you could please provide a letter addressing Echo Solar as soon as possible, that would be greatly appreciated. It can be a statement on your letterhead with your signature if you like, or even a reply to this email.

Thank you in advance and let me know if you have any questions!

Sincerely,

Kristen Gulick (she/her) | Environmental Planner II | Tetra Tech

Mobile (541) 740-3316 | kristen.gulick@tetratech.com

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TETRA TECH

- Certificate No. 33488 has an allowable instantaneous flow of 0.22 cubic feet per second (cfs) and a priority date of July 29, 1963. The point of appropriation for this right is the Railroad Well (Well No. 2).
- Certificate No. 33489 has a water right for 0.33 cfs, with a priority date of July 29, 1963. The point of appropriation for this certificate is the City Well.
- Certificate No. 37615 is permitted to withdraw 1.34 cfs and has a priority date of March 6, 1959. The original point of appropriation for this certificate is Well No. 3. Transfer No. 11601 was approved in 2013, adding Well No. 5 as an additional point of appropriation to this right, and Certificate No. 37615 was cancelled. A new certificate can be issued once a Claim of Beneficial Use (COBU) is submitted and reviewed by the OWRD. A COBU was submitted by Anderson Perry & Associates, Inc., in the winter of 2015.
- Permit No. 17091 is permitted to withdraw 2.2 cfs and has a priority date of September 22, 1977. The original point of appropriation for this water right was Well No. 4. In 1996, the Pilot Well was added as an additional point of appropriation to this right through Permit Amendment No. T-7440. In 2013, Well No. 5 was also added as an additional point of appropriation through Permit Amendment No. T-11584.
- The total combined water rights for the City's active wells (Railroad Well [Well No. 2] and Wells No. 3, 4, 5, and the Pilot Well) are 3.76 cfs, or approximately 1,690 gpm.

The City also holds a surface water right to the Umatilla River for the surface water diversion system that once supplied the City's water. This water right is for 11.58 cfs (5,200 gpm) and has a priority date of September 11, 1894. In 1996, with the assistance of the Staley Starch Company, the City submitted an application to the OWRD to transfer the Umatilla River point of diversion to a location west of the City and close to the Staley Starch Company. This transfer of diversion point was approved by the OWRD. A total of 2.01 cfs was transferred to the new point of diversion. The new point of diversion on the Umatilla River is near the point where Stage Gulch Ditch flows into the Umatilla River. Through a cooperative effort of the Staley Starch Company and the City of Stanfield, a 2.0 cfs diversion pump station was constructed at the new diversion point. The pump station was recently washed out and has not been replaced. The City uses a pump at this location to supply water to City-owned land for irrigation purposes. The City plans to continue maintaining this municipal water right to serve the City as an emergency backup water supply, to provide supplemental water when needed for bulk water sales, and in case future needs require an additional water source when groundwater sources may no longer be available. To utilize this source in the near term for domestic purposes would require a substantial investment in new surface water treatment capabilities.

The City also has two water rights associated with the wastewater treatment facility, one for storage and the other for irrigation. Copies of the City's water rights information are presented in Appendix F. A summary of the City's water rights, as well as maximum daily and monthly diversions, is included on Figure 3-1.

Critical Groundwater Areas

The City of Stanfield is located within the boundaries of the Stage Gulch Critical Groundwater Area (CGWA). Under OAR 690, Division 507, the "Umatilla Basin Program," each subarea within the CGWA is allowed a "sustainable annual yield." This is the estimated amount of water that may be withdrawn from the basalt aquifer without causing aquifer levels to decline. For each subarea, the sustainable

Attachment O-3: Record of Correspondence with Port of Morrow

December 7, 2022

Re: Water Availability

Dear Pine Gate Renewables, LLC:

The Port of Morrow owns three Industrial Parks in Morrow County. One is located in Boardman, another one is located six miles west of Boardman at the Port's Airport and one is near Heppner, at the old Kinzua Mill site. At two of those locations, we have water that might be available to sell to the Echo Solar Project.

In Boardman we have several wells and deliver water to many industries located here. We also purchase water from the City of Boardman on a contractual basis and resell to Industries.

With our water sources as well as our agreement with the City of Boardman, we may have adequate water supply to sell you the 6.5 million gallons per month from that system. We may also be able to sell you that amount from the site in Heppner.

If you need any additional information, please don't hesitate to contact me.

Regards,

Mark Patton
Chief Operations Officer
541.571.1311
markp@portofmorrow.com