

Notice of Intent to Apply for a Site Certificate

**Saddle Butte Energy Facility
December 2025**

**Submitted to
Oregon Energy Facility Siting Council**

**Prepared for
Saddle Butte Wind, LLC**

Prepared by



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Acronyms and Abbreviations

ACDP	Air Contaminant Discharge Permit
Applicant	Saddle Butte Wind, LLC
ASC	Application for Site Certificate
BESS	battery energy storage system
BPA	Bonneville Power Administration
CFR	Code of Federal Regulations
EFSC	Oregon Energy Facility Siting Council
EFU	Exclusive Farm Use
FAA	Federal Aviation Administration
Facility	Saddle Butte Energy Facility
GCCP	Gilliam County Comprehensive Plan
GCZO	Gilliam County Zoning Ordinance
kV	kilovolt
MW	megawatt
MWh	megawatt-hours
NEPA	National Environmental Policy Act
NHD	National Hydrography Dataset
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
ODEQ	Oregon Department of Environmental Quality
ODOT	Oregon Department of Transportation
ODFW	Oregon Department of Fish and Wildlife
ORS	Oregon Revised Statutes
POI	point of interconnection
RFPD	Rural Fire Protection District
SCADA	Supervisory Control and Data Acquisition
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
WPCF	Water Pollution Control Facilities

Exhibit A. Applicant Information – OAR 345-020-0011(1)(a)

(a) Exhibit A. Information about the applicant and participating persons, including:

(A) The name and address of the applicant including all co-owners of the proposed facility, the name, mailing address, email address and telephone number of the contact person for the NOI, and if there is a contact person other than the applicant, the name, title, mailing address, email address and telephone number of that person;

Response:

Name and mailing address of Applicant:

Saddle Butte Wind, LLC
c/o Brookfield Renewable N.A.
200 Liberty St., 14th Floor
New York, NY 10281

Applicant contact person for the Notice of Intent (NOI) with mailing address and telephone number:

Ben Mallernee; Sr. Manager, Asset Development
Brookfield Renewable N.A.
200 Liberty St., 14th Floor
New York, NY 10281
ben.mallernee@brookfieldrenewable.com
(646) 992-2369

(B) The contact name, mailing address, email address and telephone number of all participating persons, other than individuals, including but not limited to any parent corporation of the applicant, persons upon whom the applicant will rely for third-party permits or approvals related to the facility, and persons upon whom the applicant will rely in meeting any facility standard adopted by the Council;

Response:

Parent Company:

Brookfield Renewable N.A.
200 Liberty St., 14th Floor
New York, NY 10281

Contact Name, Mailing Address, Email Address, and Telephone Number:

Berk Gursoy; Vice President, Asset Development
Brookfield Renewable N.A.
200 Liberty St., 14th Floor
New York, NY 10281
berk.gursoy@brookfieldrenewable.com
(646) 992-2429

Contact persons other than the Applicant:

Aaftab Jain
Tetra Tech, Inc.
1750 S Harbor Way, Suite 400
Portland, OR 97201
(425) 482-7600
aaftab.jain@tetrattech.com

Sarah Curtiss
Stoel Rives LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
(503) 294-9829
sarah.curtiss@stoel.com

(C) If the applicant is a corporation:

(i) The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the NOI;

(ii) The date and place of its incorporation;

*(iii) A copy of its articles of incorporation and its authorization for submitting the NOI;
and*

*(iv) In the case of a corporation not incorporated in Oregon, the name and address of the
resident attorney-in-fact in this state and proof of registration to do business in Oregon;*

Response:

The Applicant is not a corporation.

*(D) If the applicant is a wholly owned subsidiary of a company, corporation or other business
entity, in addition to the information required by paragraph (C), the full name and business
address of each of the applicant's full or partial owners;*

Response:

The Applicant, Saddle Butte Wind, LLC, is a subsidiary of their parent company:

Brookfield Renewable N.A.

200 Liberty St., 14th Floor

New York, NY 10281

(E) If the person submitting the NOI is an association of citizens, a joint venture or a partnership:

*(i) The full name, official designation, mailing address, email address and telephone
number of the person responsible for submitting the NOI;*

*(ii) The name, business address and telephone number of each person participating in the
association, joint venture or partnership and the percentage interest held by each;*

(iii) Proof of registration to do business in Oregon;

*(iv) A copy of its articles of association, joint venture agreement or partnership agreement
and a list of its members and their cities of residence; and*

*(v) If there are no articles of association, joint venture agreement or partnership
agreement, the applicant must state that fact over the signature of each member;*

Response:

The Applicant is not an association of citizens, a joint venture, or partnership.

(F) If the applicant is a public or governmental entity:

*(i) The full name, official designation, mailing address, email address and telephone
number of the person responsible for submitting the NOI; and*

(ii) Written authorization from the entity's governing body to submit an NOI;

Response:

The Applicant is not a public or governmental entity.

(G) If the applicant is an individual, the individual's mailing address, email address and telephone number;

Response:

The Applicant is not an individual.

(H) If the applicant is a limited liability company:

(i) The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the NOI;

(ii) The date and place of its formation;

(iii) A copy of its articles of organization and its authorization for submitting the NOI; and

(iv) In the case of a limited liability company not registered in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon.

Response:

The Applicant is a limited liability company. The Applicant contact submitting this NOI is:

Ben Mallernee; Sr. Manager, Asset Development
Brookfield Renewable N.A.
200 Liberty St., 14th Floor
New York, NY 10281
ben.mallernee@brookfieldrenewable.com
(646) 992-2369

The officer for Saddle Butte Wind, LLC is:

Berk Gursoy; Vice President, Asset Development
Brookfield Renewable N.A.
200 Liberty St., 14th Floor
New York, NY 10281
berk.gursoy@brookfieldrenewable.com
(646) 992-2429

Saddle Butte Wind, LLC, was formed with the Secretary of State of the State of Delaware and was acknowledged and registered to do business in Oregon by the Oregon Secretary of State in July 2009. The articles of organization and proof of registration to do business in Oregon are provided in Attachment 1.

Exhibit B. Facility Description – OAR 345-020-0011(1)(b)

(b) Exhibit B. Information about the proposed facility, including:

(A) A description of the proposed energy facility, including as applicable:

Response:

The Applicant proposes to construct and operate the Saddle Butte Energy Facility (Facility), a wind energy facility located approximately 6 miles southwest of the city of Arlington in Gilliam County, Oregon (Figure 1). The site boundary encompasses approximately 11,500 acres of private land. As described in more detail below, the Facility is anticipated to generate up to 488 megawatts (MW) of wind energy with up to 1,952 megawatt-hours (MWh) of energy storage capacity. The Facility's proposed point of interconnection (POI) would be a new Bonneville Power Administration (BPA) substation called Diamond Butte that BPA is currently planning to construct within the site boundary along the existing 500-kilovolt (kV) Ashe-Marion No. 2 Transmission Line (Figure 2). Construction of the BPA substation is not included as part of the Applicant's proposal.

The Applicant is currently conducting studies that will be included in the Application for Site Certificate (ASC) to the Oregon Energy Facility Siting Council (EFSC). The Applicant intends to begin on-site construction in Q2 2027, pending issuance of a site certificate from EFSC, with a commercial operation target date in Q2 2029.

(i) For electric power generating plants, the nominal electric generating capacity and the average electrical generating capacity, as defined in ORS 469.300;

Response:

The Facility will have up to 488 MW of nominal generating capacity and up to 162.67 MW of average generating capacity, as defined in Oregon Revised Statutes (ORS) 469.300(4)(c).

(ii) Major components, structures and systems, including a description of the size, type and configuration of equipment used to generate, store, transmit, or transport electricity, useful thermal energy, or fuels;

Response:

The Facility's major components are the wind turbines, battery energy storage system (BESS), and related electrical collector and substation equipment. The ASC will analyze potential impacts associated with the worst-case scenario layout (i.e., largest project layout) within the approximately 11,500-acre site boundary. For wind turbines, the turbine model that causes the greatest impact to the resource under consideration will be evaluated and presented in the respective exhibit. For example, for scenic resources and protected areas, an analysis will be

conducted using the tallest turbine and the layout with the greatest number of turbines. Thus, the ASC will demonstrate that the Facility meets the various EFSC standards, while providing the Applicant with flexibility for siting components within EFSC-approved development areas (e.g., micro-siting wind turbines).

During pre-construction and final design engineering, the Applicant will specify the Facility components, equipment, and layout in accordance with the reporting requirements of the Oregon Department of Energy (ODOE). The Applicant seeks to be able to accommodate market changes, evolving technology, and to preserve design and layout flexibility.

The following description of major components is based on the best design information available at this time and may be modified in the ASC and later as part of final design:

Wind Components

- **Wind Turbines.** A wind turbine generator consists of a three-bladed rotor, attached to a nacelle that is mounted on a tubular tower. In operating mode, the rotor is located on the upwind side of the tower.
 - The Applicant is considering the following wind turbine model:
 - Nominal power of up to 8 MW;
 - Rotor diameter of up to 575 feet; and
 - Tower height (i.e., hub height) of up to 410 feet. Thus, the combined tower and rotor height will not exceed 698 feet.
 - Up to 70 wind turbine locations are being assessed in early design and will be included in the ASC. The area covered by the rotating blades is referred to as the rotor swept area. The turbine begins generating electricity at wind speeds of approximately 6-7 miles per hour, although this wind speed varies by turbine size and manufacturer. At wind speeds greater than about 60 miles per hour, the turbines will shut down and the rotor will be automatically locked to prevent damage to the machine.
- **Nacelles.** The nacelle sits atop the turbine tower. It houses the gearbox, generator, power converter and control systems for the turbine, and is where the turbine blades attach. Access to the nacelle is via a ladder inside the turbine tower, which is accessible by a locked doorway at the base of the tower. The nacelle is mounted to the turbine tower on a geared plate that allows the turbine to rotate horizontally, orienting the nacelle such that the rotor faces into the wind to maximize capture of the available wind resource.
- **Blades and Rotors.** Turbine blades are attached to the rotor hub, which is mounted to the front of the nacelle. A rotor blade is made of lightweight wood, metal, laminated fiberglass and carbon fiber, and typically is constructed as a single piece (although it is possible that blades may be fabricated in two pieces for ease of transport and assembly at the Facility).

The rotor diameters under consideration by the Applicant are up to 575 feet, with rotor blades of up to 288 feet.

- **Turbine Towers.** A turbine tower is a cylindrical steel structure tapered from the base to the top. The nacelle is mounted on top. Tower heights vary by turbine model and manufacturer; the model under consideration by the Applicant reaches up to 410 feet. A self-diagnosing controller is located inside the base within the tower. Each tower is hollow, and will feature a locked entry door at ground level, with an internal access ladder with safety platforms for access to the nacelle. Towers will be fabricated in sections and assembled on-site. Towers will be uniformly painted a Federal Aviation Administration (FAA)-approved color suitable for daytime marking and air navigation.
- **Turbine Foundations.** A turbine tower is secured to a reinforced concrete foundation. The actual foundation type and design for each tower will be determined after on-site geotechnical studies are completed but are often either spread-footing (most common) or caisson-type concrete foundations. The spread-footing foundations for the turbine sizes under consideration can reach a depth of 16 – 20 feet below grade and 85 – 100 feet in diameter, while exact design dimensions depend on turbine model and soil conditions. At some locations, the foundation subbase may require improvement to raise the bearing capacity. During construction, a temporary staging area will be cleared beside each turbine tower base, where turbine components will be offloaded and staged prior to assembly. An engineered, graveled pad may be installed adjacent to the foundation. During construction, this or temporary rig matting will serve as a pad for the construction crane, and following construction, a parking area for maintenance vehicles.
 - **Pad-mount Transformer:** For wind turbines that do not have a step-up transformer in the nacelle, a pad-mounted transformer is installed at each turbine to step up the output voltage from the turbine to the collector system voltage (34.5 kV).
- **Collection System.** The 34.5-kV transformers will connect the generation output of the wind turbines to 34.5-kV collector lines which may be underground or overhead. Where underground, the collector lines will be buried to a minimum depth of 3 feet. Overhead collector lines will be supported by wooden or steel pole structures. Locations and dimensions of the collector lines will be determined as the project design advances. The 34.5-kV collector lines will connect the 34.5-kV transformers to the two collector substations, where transformers will again step the power up to 230 kV. This will enable more efficient delivery from the satellite collector substation to the central collector substation within the site boundary.
- **Satellite Collector Substation.** A satellite collector substation will be constructed to support the proposed Facility and will be located within the site boundary. Prior to construction, the satellite collector substation site will be cleared and graded, with a bed of crushed rock applied for a durable surface. The satellite collector substation will consist of

230-kV transformers, switchgear, and other equipment (e.g. protection and controls, metering, communications) as determined at final design. A 230-kV generation tie will connect the satellite collector substation to the central collector substation.

- **Central Collector Substation.** One central collector substation will be constructed adjacent to BPA's proposed Diamond Butte substation, which BPA is planning to construct within the site boundary (Figure 2) along the existing Ashe-Marion No. 2 Transmission Line. At the central collector substation, 500/230-kV transformers will step up the voltage to 500-kV and ultimately connect to BPA's 500-kV transmission system. Since BPA's 500-kV transmission line is running through the site boundary and the project's 500-kV substation will be built adjacent to BPA's Diamond Butte substation, a short 500-kV generation tie (one or two spans) will be needed to connect the project to the adjacent BPA network. Prior to construction, the central collector substation site will be cleared and graded, with a bed of crushed rock applied for a durable surface. The central collector substation will consist of transformers, switchgear, and other equipment (e.g. protection and controls, metering, communications) as will be determined at final design.

Battery Energy Storage System (BESS) Components

- **BESS.** The Facility includes a BESS of up to 488 MW, with up to 1,952 MWh of energy storage capacity. The BESS can be configured as a single facility near the Facility's POI or split between the two collector substations. The BESS is capable of storing and later deploying energy generated by the Facility and/or charging and discharging directly from and to the grid. The Applicant anticipates using lithium-ion technology for the BESS. The batteries will be housed in a series of self-contained enclosures located on concrete pads within a centralized fenced area.

(iii) Methods for waste management and waste disposal, including, to the extent known, the amount of wastewater the applicant anticipates, the applicant's plans for disposal of wastewater and storm water, and the location of disposal;

Response:

The Facility will not use water in the generation of electricity or produce wastewater for disposal. The Facility will not generate significant quantities of solid waste. Waste and recyclable products will be hauled offsite and disposed of at licensed waste management facilities. An operations and maintenance (O&M) building may be constructed to house the O&M staff, equipment, and spare parts within the proposed site boundary. Alternatively, an existing facility (e.g. warehouse) in the vicinity of the project may be utilized for this purpose. If a new O&M building is to be constructed, it will contain a kitchen and bathroom, with a septic system to support the building. Required permits to construct the septic system will be obtained from Umatilla County on behalf of Gilliam County and the Oregon Department of Environmental Quality (ODEQ). Further details of stormwater

drainage and wastewater disposal during construction and operations are provided in Exhibit K of this NOI.

(iv) For thermal power plants, combustion turbine power plants, or other facilities designed to generate electricity from any gas, liquid, or solid fuels:

(I) A discussion of the source, quantity and availability of all fuels proposed to be used in the facility to generate electricity or useful thermal energy;

(II) If the facility will generate electric power from natural gas, petroleum, coal or any form of solid, liquid or gaseous fuel derived from such material, a discussion of methods the facility will use to ensure that the facility does not emit greenhouse gasses into the atmosphere, and a description of any equipment the facility will use to capture, sequester, or store greenhouse gases;

(III) A discussion of the methods for the disposal of waste heat generated by the facility;

Response:

The Facility is not a thermal power plant, combustion turbine power plant, or other facility designed to generate electricity from any gas, liquid, or solid fuels. The Facility will generate wind power; consequently, no waste heat will be generated.

(v) For transmission lines, approximate transmission line voltage, load carrying capacity and type of current;

Response:

The Facility does not include a transmission line that, by itself, is an energy facility under the definition in ORS 469.300(11)(a)(C). The Facility will include various collector lines that will transport power to the central switchyard/substation, where the power will be stepped up to interconnection voltage, located at the POI.

(vi) For pipelines, approximate operating pressure and delivery capacity in thousand cubic feet per day;

Response:

The Facility is not a pipeline. Therefore, this rule is not applicable.

(vii) For surface facilities related to underground gas storage, estimated daily injection and withdrawal rates, horsepower compression required to operate at design injection or withdrawal rates, operating pressure range and fuel type of compressors;

Response:

The Facility does not involve underground gas storage. Therefore, this rule is not applicable.

(viii) For facilities to store liquefied natural gas, the approximate volume, maximum pressure, liquefaction and gasification capacity in thousand cubic feet per hour;

Response:

The Applicant does not propose the storage of liquefied natural gas. Therefore, this rule is not applicable.

(B) A description of major components, structures and systems of each related or supporting facility; and

Response:

Related or supporting facilities consist of the O&M building, communication and Supervisory Control and Data Acquisition (SCADA) system, site access and service roads, perimeter fencing and gates, temporary construction areas, and temporary workforce housing. The following descriptions are based on the best available information at this time and may be modified in the ASC and at final design prior to construction:

- **O&M Building.** The Facility may include one O&M building and O&M storage containers. The O&M building may include bathrooms, a kitchen, offices, and meeting rooms. The O&M storage containers will be Conex structures. Graveled parking and a storage area for employees, visitors, and equipment will be located adjacent to the O&M building. The building's water will be supplied by on-site wells permitted for Facility use or nearby municipal facilities with existing water rights. It will also have a septic system, and power will be supplied by a local service provider using overhead and/or underground distribution lines. Alternatively, an existing facility (e.g. warehouse) in the vicinity of the site boundary may be utilized as the O&M building.
- **Communication and SCADA System.** A communication system consisting of fiber optic and copper communication lines will connect the turbines and collector substation to the O&M building. These communication lines will run with the collector lines, either buried or overhead, depending on site-specific conditions. Where buried, the communication lines are placed above the collector lines in the trench, and where overhead, run alongside the collector lines. This communication system allows each turbine and substation to be monitored by a SCADA system installed in the O&M building. This system monitors each turbine for variables such as meteorological conditions, critical operating parameters, and power output. The turbines are controlled via the SCADA system and can be controlled remotely. SCADA software is tuned specifically to the needs of each wind project by the turbine manufacturer or a third-party SCADA vendor.
- **Site Access and Service Roads.** The Facility will utilize existing access roads to the extent practicable. Primary transportation corridors to the Facility include Interstate 84 (I-84), Oregon Route 19 (OR-19), and Gilliam County local roads.

New service roads will be constructed within the site boundary to provide access to Facility infrastructure. Roads will be compacted gravel and up to 20 feet wide. During construction, crane paths of up to 50 feet wide will cause temporary disturbance but will be co-located with gravel service roads where possible. Temporary disturbance areas will be reclaimed upon completion of construction. All existing public roads used to access the Facility will be left in “as good or better” condition than that which existed prior to the start of construction. Upgrades to existing roads or the construction of new roads will be done according to applicable state and county road standards, and after consultation with Gilliam County staff members.

The Applicant will provide a proposed layout of new roads and transportation routes in the ASC. It is the Applicant's intent to use existing roads wherever possible, and to minimize impacts to the agricultural and grazing effectiveness of the land by working in conjunction with the landowners on new road construction. All newly constructed roads will be graded and graveled to meet load requirements for all equipment. Use of the roads may continue after construction, or new roads may be removed and the land reclaimed to pre-construction conditions.

- **Perimeter Fencing and Gates.** Perimeter fencing will enclose the substations and BESS. The perimeter fencing will be 6 to 8 feet in height and have lockable vehicle access gates. Existing fencing supporting cattle grazing land use will remain.
- **Temporary Construction Areas.** Temporary construction areas will be needed for development of the proposed Facility to facilitate the delivery and assembly of materials and equipment. These temporary construction areas may contain temporary storage of diesel and gasoline fuels located in aboveground tanks and within designated secondary containment areas. The temporary construction areas will be within the site boundary.
- **Temporary Workforce Housing.** The Applicant is considering options for incorporating temporary workforce housing. If the Applicant determines that the provision of temporary housing may be needed and it would be feasible to provide temporary housing at the site, this will be described in the ASC.

(C) The approximate dimensions of major facility structures and visible features.

Response:

Preliminary estimates of dimensions for major structures are summarized below and will be updated in the ASC and prior to construction at final design. The ASC will assess the maximum anticipated impacts of Facility structures and visible features.

- **Wind Turbines:** The proposed quantity and location of wind turbines are still being assessed in early design and will be included in the ASC. The combined tower and rotor height of the wind turbines will not exceed 698 feet. This includes a hub height of up to 410 feet and a rotor diameter of up to 575 feet, with individual rotor blades measuring up to 288 feet in length.

- **BESS:** The lithium-ion batteries are anticipated to be housed in a series of self-contained enclosures measuring approximately 8 to 10 feet wide, 40 feet long, and 7 to 10 feet tall, and located on a concrete pad within an approximately 50-acre centralized area, likely near the Facility's POI. Each container holds the batteries, a supervisory and power management system, and a fire detection and limited suppression system. Cooling units will be placed either on top of the containers or along the side, depending on the equipment selected at final design. Associated inverters will either be integrated into the container design or kept separate.
- **Satellite Collector Substation:** One satellite collector substation will be used for the proposed Facility and will be located within the Project site boundary. The satellite collector substation will be located on an approximately 8-acre area and will be enclosed by a locked chain-link fence.
- **Collector Lines (Overhead):** Each substation will have 34.5-kV underground or overhead collector lines connecting the Facility's turbines to the 230-kV transformers. The satellite collector substation will then have a 230-kV overhead collector line connecting it to the central 500-kV collector substation within a corridor up to 150 feet wide. The specific quantity, locations, and dimensions of the collector lines will be determined as the Facility design progresses. These lines will be within the site boundary and connect the collector substation to the central substation.
- **Collector Lines (Underground):** Some of the 34.5-kV collector lines may run underground for improved reliability. These underground collector lines would be directly buried to a minimum depth of 3 feet.
- **Central Collector Substation:** The Facility will include one 500-kV central collector substation that will include 500/230-kV and 230/34.5-kV transformers and associated switchgear and other equipment. This central collector substation will be built adjacent to BPA's proposed Diamond Butte substation, which BPA is planning to construct within the Facility site boundary along the existing BPA 500-kV Ashe-Marion No. 2 Transmission Line.
- **O&M Building:** If constructed new, the O&M building is expected to be a one-story structure approximately 4,000 – 8,000 square feet in size and house O&M crews, equipment, and spare parts. Details of the O&M building will be determined in later stages of design. A permanent graveled parking and storage area for employees, visitors, and equipment will be located adjacent to the O&M building.
- **Meteorological Towers:** The Facility will include five temporary meteorological towers and up to two permanent meteorological towers. Each temporary meteorological tower will have a maximum height of 197 feet and will be anchored by four guy wires. The permanent meteorological towers will have a maximum height matching the hub height of the wind turbines.

- **Temporary Construction Areas:** Temporary construction areas will occur within the Facility site boundary and described in the ASC. If a temporary concrete batch plant is needed, it will be located within a temporary construction area.

Exhibit C. Facility Location – OAR 345-020-0011(1)(c)

(c) Exhibit C. A description of the location of the proposed energy facility site and the proposed site of each related or supporting facility and all areas that might be temporarily disturbed during construction of the facility, including the approximate land area of each.

Response:

The Facility site boundary includes approximately 11,500 acres of privately owned land in Gilliam County, Oregon. The Facility is located approximately 6 miles southwest from the City of Arlington and generally bounded by OR-19 to the east, W Road to the west, and Middle Rock Creek Lane to the south. The John Day River is approximately 5 miles to the west, and I-84 and the Columbia River are approximately 4 miles to the north. The site boundary encompasses the townships, ranges, and sections listed in Table C-1.

Table C-1. Townships, Ranges, and Sections of the Facility Site Boundary

Township and Range	Sections
1N 20E	1,2,3,4,9,10,11,12,13,14
1N 21E	4,5,6,7,8,9,16,17,18
2N 20E	13,14,21,23,24,25,26,27,28,33,34,35,36
2N 21E	19,31,32,33

Exhibit D. Alternative Locations – OAR 345-020-0011(1)(d)

*(d) **Exhibit D.** If the proposed energy facility is a pipeline or a transmission line or has, as a related or supporting facility, a transmission line or pipeline that, by itself, is an energy facility under the definition in ORS 469.300, identification of at least two proposed corridors, as defined in OAR 345-001-0010, or identification of a single proposed corridor with an explanation of why alternate corridors are unlikely to better meet the applicant's needs and satisfy the Council's standards. The applicant must include an explanation of the basis for selecting the proposed corridors and, for each proposed corridor, the information described in subsections (e), (g), (i), (j), (k), (L), (o) and (q) that is available from existing maps, aerial photographs, and a search of readily available literature.*

Response:

The Facility is not a pipeline, nor a transmission line as defined by ORS 469.300. The Facility includes neither a pipeline nor transmission line that, by themselves, would be considered an energy facility under ORS 469.300(11)(a)(C).

Exhibit E. Permits Needed for Construction and Operation – OAR 345-020-0011(1)(e)

*(e) **Exhibit E.** Identification of all federal, state and local government permits related to the siting of the proposed facility, a legal citation of the statute, rule or ordinance governing each permit, and the name, address, email address and telephone number of the agency or office responsible for each permit. For each permit, the applicant must provide a preliminary analysis of whether the permit should or should not be included in and governed by the site certificate.*

Response:

Table E-1 identifies the applicable federal, state, and local permits required for construction and operation of the Facility.

Table E-1. Permits or Other Approvals Required for Construction and Operation of the Facility

Permit	Agency	Authority/Description
Federal Permits		
Notice of Proposed Construction or Alteration (Form 7460-1)	Federal Aviation Administration (FAA) Attn: Dan Shoemaker Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Ave SW Renton, WA 98057 (425) 227-2791 Dan.Shoemaker@faa.gov	Federal Aviation Act of 1958 (14 United States Code (USC) § 44718); 14 Code of Federal Regulations (CFR) § 77 Description: The Applicant proposes construction or alterations that may affect navigable airspace. No permit is issued by the FAA. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.
Supplemental Notice of Actual Construction or Alteration (Form 7460-2)	FAA Attn: Dan Shoemaker Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Ave SW Renton, WA 98057 (425) 227-2791 Dan.Shoemaker@faa.gov	Federal Aviation Act of 1958 (14 USC § 44718); 14 CFR § 77 Description: If a Notice of Proposed Construction or Alteration with the FAA is required, then submission of the Supplemental Notice of Actual Construction or Alteration form must be filed within 5 days after construction reaches its greatest height as specified in the No Hazard Determination. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.

Permit	Agency	Authority/Description
Record of Decision/ National Environmental Policy Act Compliance	Bonneville Power Administration (BPA) Attn: Laura Green, Manager PO Box 3621 Portland, OR 97208-3621 (360) 418-8633 legreen@bpa.gov	National Environmental Policy Act (NEPA), Section 102 (42 USC § 4332); 40 CFR § 1500 Description: Interconnection to BPA's transmission system is subject to review under NEPA. BPA will lead this process as a separate action from the site certificate process. This federal process is not within the jurisdiction of EFSC and therefore should not be included within the site certificate.
Clean Water Act, Section 404	U.S. Army Corps of Engineers, Portland District Attn: Gilliam County Contact PO Box 2946 Portland, OR 97208-2946 (503) 808-4368 PortlandRegulatory@usace.army.mil	Clean Water Act, Section 404 (33 USC § 1344); 33 CFR §§ 320, 323, 325-28, and 330 Description: A Section 404 permit will be required if dredge or fill occurs in waters of the United States. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.
Incidental Take Permit or Eagle Take Permit	U.S. Fish and Wildlife Service (USFWS) Attn: Jeffrey A Dillon, Endangered Species Division Manager 2600 SE 98th Avenue, Suite 100 Portland, OR 970266 (503) 231-6179 Jeffrey_Dillon@fws.gov	Section 7, 9, and 10 Consultation under the Endangered Species Act; Bald and Golden Eagle Protection Act Description: The Facility is not anticipated to impact federally listed species or protected eagles. However, if impacts to federally listed species or eagles are determined not to be avoidable based on the results of field surveys and ongoing coordination with USFWS, the Applicant will pursue an Incidental Take Permit or Eagle Take Permit with the USFWS as applicable. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.
State Permits		
Energy Facility Site Certificate	Oregon Department of Energy and Energy Facility Siting Council Attn: Todd Cornett, Assistant Director 550 Capitol Street NE Salem, OR 97301 (503) 428-2962 Todd.Cornett@oregon.gov	ORS 469.300 et seq.; Oregon Administrative Rule (OAR) Chapter 345, Divisions 1, 21-24 Description: This site certificate is the subject of this NOI.

Permit	Agency	Authority/Description
Removal/Fill Permit (including Individual Permit, General Removal-Fill Permit, and General Authorization)	Oregon Department of State Lands Attn: Richard Fitzgerald, Removal Fill 1645 NE Forbes Rd., Suite 112 Bend, OR 97701 (541) 388-6112 Richard.W.Fitzgerald@dsl.oregon.gov	Oregon Removal-Fill Law (ORS 196.795 - 196.990); OAR Chapter 141, Divisions 85, 89, 90, 93, 100. A person or utility is required to have a permit if an activity will involve filling or removing 50 cubic yards or more of material in a wetland or waterway. For sites within a state-designated Essential Indigenous Anadromous Salmonid Habitat (ESH), State Scenic Waterway, or compensatory mitigation site, a permit is required for any amount of removal or fill. If this is proposed or needed, the Removal-Fill Permit should be included in and governed by the EFSC site certificate under ORS 469.401(3).
National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit 1200-A	Oregon Department of Environmental Quality (ODEQ) Attn: Jason Simpson 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255 Jason.Simpson@deq.oregon.gov	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45 Description: The NPDES 1200-A permit is required for concrete and asphalt mix batch plants which discharge stormwater to surface water. If needed, the Applicant or a third-party contractor will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
NPDES Stormwater Discharge Permit 1200-C	ODEQ Attn: Jason Simpson 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255 Jason.Simpson@deq.oregon.gov	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45 Description: The NPDES 1200-C permit is required for construction activities that will disturb one or more acres of land. The Applicant will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
401 Water Quality Certification	ODEQ Attn: Amber Clark, Individual Certifications for Western and Eastern Regions 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (503) 960-1123 Amber.Clark@deq.oregon.gov	Clean Water Act, Section 401 (33 USC § 1341); OAR Chapter 340, Division 48 Description: Water quality certification is required for facilities that are processed under the U.S. Army Corps of Engineers Section 404 Nationwide Permits. The Applicant will obtain this permit, if needed, directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.

Permit	Agency	Authority/Description
Water Pollution Control Facilities (WPCF) Permit, WPCF-1000, Gravel Mining and Batch Plant	ODEQ Attn: Jason Simpson 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255 Jason.Simpson@deq.oregon.gov	OAR Chapter 340, Division 45 Description: A WPCF-1000 authorizes the permittee to operate a wastewater collection, treatment, control, and disposal system for sand, gravel, and other nonmetallic mineral quarrying and mining operations, including asphalt-mix batch plants, concrete batch plants, and other related activities. If a temporary batch plant is needed for Facility construction, the Applicant's third-party contractor will obtain a WPCF-1000 permit from ODEQ, which would therefore not be included in or governed by the site certificate.
On-site Sewage Disposal Construction-Installation Permit	ODEQ Attn: Jason Simpson 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255 Jason.Simpson@deq.oregon.gov	ORS 454 and 468B; OAR Chapter 340, Division 71 Description: Facilities with an on-site sewage disposal system must obtain a Construction-Installation Permit before construction. The Facility will have a daily sewage flow of fewer than 2,500 gallons. If required, the Applicant's construction contractor will obtain the permit from ODEQ for the O&M building. Therefore, this permit should not be included in or governed by the site certificate.
Air Contaminant Discharge Permit (ACDP)	ODEQ Attn: Air Quality Permit Coordinator 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 633-2021 eraqpermits@deq.oregon.gov	OAR Chapter 340, Division 216 Description: Each mobile concrete batch plant used will require an associated ACDP. Depending on the anticipated volume of concrete to be made by each plant, either a Basic or General Air Contaminant Discharge Permit would be required. If a stationary or portable concrete manufacturing plant is required for Facility construction, the Applicant's third-party contractor will obtain a Basic ACDP from ODEQ. This permit is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
Oversize Load Movement Permit/Load Registration	Oregon Department of Transportation (ODOT) Attn: Ben Ebner, Region 4 Manager Region 4 Headquarters 63055 N Highway 97 Bend, OR 97703 (541) 815-6876	ORS 818.030; OAR Chapter 734, Division 82 Description: Authorization for oversized loads. Movement of construction cranes and other equipment and materials may require this permit. If needed, the Applicant's third-party contractor will obtain this permit and load registration from ODOT and therefore this permit should not be included in or governed by the site certificate.

Permit	Agency	Authority/Description
Access Management Permit	<p>ODOT Attn: ODOT Utility and Miscellaneous Permit Specialist ODOT District 9 3313 Bret Clodfelter Way The Dalles, OR 97058 (541) 980-3770</p>	<p>OAR Chapter 734, Division 51 Description: Access from Oregon state highways will require an access permit, which may be issued by the local ODOT District Office. If needed, the Applicant's third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.</p>
Permit to Occupy or Perform Operations Upon a State Highway	<p>ODOT Attn: ODOT Utility and Miscellaneous Permit Specialist ODOT District 9 3313 Bret Clodfelter Way The Dalles, OR 97058 (541) 980-3770</p>	<p>OAR Chapter 734, Division 55 Description: Utility installations within the right of way of a state highway in Oregon require a permit issued by ODOT. If needed, the Applicant's third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.</p>
Airspace Review	<p>Oregon Department of Aviation Attn: Alex Thomas, Planning, Policy, and Programs Manager 3040 25th Street, SE Salem, OR 97302 (503) 375-2357 Alex.R.THOMAS@odav.oregon.gov</p>	<p>14 CFR § 77; ORS 836.530 and 836.535; OAR Chapter 738, Division 70 Description: The Oregon Department of Aviation provides an airspace review and determination letter following review of Form 7460-1 for structures greater than 200 feet above ground surface or within the distances from airports listed in OAR 738-070-0110. No permit is issued by the Oregon Department of Aviation. The airspace review is useful in understanding the 7460-1 process but is outside EFSC jurisdiction. Therefore, this permit should not be included in or governed by the site certificate.</p>
Water Right Permit or Water Use Authorization	<p>Oregon Water Resources Department Water Rights Section, District 21 Attn: Ken Thiemann, Watermaster 221 S Oregon Street Condon, OR 97823 (541) 969-8799 Kenneth.C.Thiemann@water.oregon.gov</p>	<p>ORS 537; OAR 690 Divisions 310, 340, and 410 Description: If water for construction is not available from permitted sources, the Applicant will obtain the necessary water right permit or use authorization directly from the Oregon Water Resources Department. It is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.</p>

Permit	Agency	Authority/Description
Archaeological Excavation Permit	Oregon Parks and Recreation Department, State Historic Preservation Office Attn: John Pouley, State Archaeologist 725 Summer Street NE, Suite C Salem, OR 97301 (503) 480-9164 arch.permits@opr.d.oregon.gov	ORS Chapter 97, 358, and 390; OAR Chapter 736, Division 51 Description: Ground-disturbing activity that may affect a known or unknown archaeological resource on public or private lands requires a permit issued by the Oregon Parks and Recreation Department. If needed, the Applicant will obtain it from the State Historic Preservation Office and therefore this permit should not be included in or governed by the site certificate.
Local Permits		
Conditional Use Permit	Gilliam County Planning Department Attn: Stephanie Case, Gilliam County Planning Director 200 City Center Circle PO Box 229 Boardman, OR 97818 (541) 481-9252 cases@cityofboardman.com	ORS 469.401(3); Gilliam County Zoning Ordinance (GCZO) 4.020 Exclusive Farm Use Zone; GCZO 7.020 Wind Power Generation Facility Requirements Description: Wind power generation facilities are a conditional use in the Gilliam County Exclusive Farm Use (EFU) zone. If a holder of a site certificate issued by EFSC requests a conditional use permit for an energy facility as outlined under ORS 469.401(3) and pays the requisite fee, the Planning Director shall issue such conditional use permit, subject only to the conditions set forth in the site certificate and without hearings or other proceedings.
Building Permits (including structural/mechanical, electrical, plumbing)	City of Boardman Building Codes Division Attn: Glenn McIntire, Building Official 200 City Center Circle PO Box 229 Boardman, OR 97818 (541) 481-9252 mcintireg@cityofboardman.com	OAR 918-440-0050; City of Boardman Building Codes Description: Building permits in Gilliam County are administered by the City of Boardman. A building permit is required for review and approval prior to commencement of construction of energy facilities. Zoning approval from the Gilliam County Planning Department is required prior to issuance of a building permit. The Applicant will obtain this permit from the City of Boardman Building Codes Division prior to construction. Therefore, this permit should not be included in or governed by the site certificate.

Permit	Agency	Authority/Description
Renewable Electrical Energy Permit	City of Boardman Building Codes Division Attn: Glenn McIntire, Building Official 200 City Center Circle PO Box 229 Boardman, OR 97818 (541) 626-7011 mcintireg@cityofboardman.com	OAR 918-309-0410; City of Boardman Building Codes Description: The City of Boardman administers renewable electrical energy permits for Gilliam County. This permit may be required for renewable electrical energy system installation. If needed, the Applicant will obtain this permit prior to construction. Therefore, this permit should not be included in or governed by the site certificate.
Onsite Septic System Permit	Umatilla County Public Health, Environmental Health Division, Pendleton Office Attn: Byron Morris, Environmental Health 200 SE 3rd St Pendleton, OR 97801 (541) 278-6394 health@umatillacounty.gov	OAR 340-071-0160 Description: Umatilla County Public Health permits all sub-surface services for Gilliam County, including septic systems. This permit may be required for the construction of an on-site septic system. If needed, the Applicant will obtain this permit from the Umatilla County Public Health department prior to construction. Therefore, this permit should not be included in or governed by the site certificate.

Exhibit F. Property Ownership – OAR 345-020-0011(1)(f)

(f) Exhibit F. A list of the names and mailing addresses of property owners, as described in this rule:

(A) The list must include all owners of record, as shown on the most recent property tax assessment roll, of property located:

(i) Within 100 feet of property which is the subject of the NOI, where the subject property is wholly or in part within an urban growth boundary;

(ii) Within 250 feet of property which is the subject of the NOI, where the subject property is outside an urban growth boundary and not within a farm or forest zone; or

(iii) Within 500 feet of property which is the subject of the NOI, where the subject property is within a farm or forest zone; and

(B) In addition to incorporating the list in the NOI, the applicant must submit the list to the Department in an electronic format acceptable to the Department.

Response:

In accordance with OAR 345-020-0011(1)(f), Attachment 2 is a list of the names and mailing addresses of property owners within 500 feet of the site boundary. The Facility is located in the Gilliam County EFU zone (Figure 3). Therefore, OAR 345-020-0011(1)(f)(A)(iii) applies to the Facility. Additionally, the Applicant has provided an electronic list of the property owner information to ODOE in accordance with OAR 345-020-0011(1)(f)(B). Tax lot boundaries and assessor information for Gilliam County were obtained from the Gilliam County Assessor on November 24, 2025.

Exhibit G. Facility Maps – OAR 345-020-0011(1)(g)

(g) Exhibit G. A map or maps showing:

(A) The proposed locations of the energy facility site, all related or supporting facility sites and all areas that might be temporarily disturbed during construction of the facility in relation to major roads, water bodies, cities and towns, important landmarks and topographic features;

The required information appears on eight map figures, as follows:

Response:

The components of each figure addressing the above criteria are listed below:

- **Figure 1** shows the vicinity of the Facility site boundary in relation to county boundaries, major roads, highways, cities and towns, and airports.
- **Figure 2** is an overview of the Facility layout in relation to the surrounding area.
- **Figure 3** shows the underlying zoning designation for the Facility. The site boundary is within Gilliam County's EFU zone.
- **Figure 4** identifies the study areas and their associated distance from the site boundary that are defined by OAR 345-001-0010(35).
- **Figure 5** shows the topographic features of the surrounding area in comparison to the proposed site boundary. Local roads and county boundaries are also shown.
- **Figure 6** identifies the federal, state, and local protected areas as defined by OAR 345-001-0010(26), within a 20-mile buffer of the proposed site boundary.
- **Figure 7** shows hydrology and wetland data within the vicinity of the Facility from the National Wetlands Inventory (NWI) and National Hydrography Dataset (NHD).
- **Figure 8** shows the permitted energy facilities within 10 miles of the proposed site boundary. Additionally, major roads, existing transmission lines, an existing natural gas pipeline, and existing substations within and around the study area are shown on the figure.

(B) The proposed locations of the corridors the applicant has identified under subsection (d) in relation to major roads, water bodies, cities and towns, important landmarks and topographic features;

Response:

As previously mentioned, the Facility is not a pipeline or transmission line as defined under OAR 469.300. Additionally, the Applicant is not proposing a pipeline or transmission line that would be

considered an energy facility. Therefore, alternate corridors were not identified for the Facility under subsection (d).

(C) The study areas for the proposed facility as defined in OAR 345-001-0010;

Response:

As shown on Figure 4, the study areas defined under OAR 345-001-0010(35) include the area within the site boundary and the area within the following distances from the site boundary: a 0.5-mile area for land use, wildfire risk, and fish and wildlife habitat; a 5-mile recreational opportunities area; a 5-mile threatened and endangered plant and animal species area; a 10-mile scenic resources and public services area; and a 20-mile protected areas buffer.

(D) The topography of the study areas including streams, rivers, lakes, major roads and contour lines;

Response:

As previously mentioned, Figure 5 shows topographic features of the surrounding area in relation to the proposed site boundary. Local roads, county boundaries, contour lines, and waterbodies also are shown.

(E) All protected areas in the study area as defined in OAR 345-001-0010 for impacts to protected areas;

Response:

Protected areas defined under OAR 345-001-0010 are shown and labeled on Figure 6.

(F) The location of any potential waters of the state or waters of the United States that are on or adjacent to the site; and

Response:

Figure 7 shows potential waters of the state and potential waters of the United States using data from the NWI and NHD. Intermittent and perennial streams as categorized by NHD cross through and around the site boundary; the site boundary also contains a few areas along the eastern border categorized as playa and one small area in the southwestern portion of the site categorized as lake/pond. The NWI identified one riverine feature intersecting the southern portion of the site boundary.

(G) For energy generation facilities, the approximate locations of any other energy generation facilities that are known to the applicant to be permitted at the state or local level within the study area as defined in OAR 345-001-0010 for impacts to public services.

Response:

Biglow Canyon Wind Farm, Boardman Solar Energy Facility, Carty Generating Station, Golden Hills Wind Project, Klondike III Wind Project, Leaning Juniper IIA Wind Power Facility, Leaning Juniper IIB Wind Power Facility, Montague Solar (Pachwaywit Fields), Montague Wind, Oregon Trail Solar, and Shepherds Flat are energy facilities permitted under EFSC and are within 10 miles of the proposed site boundary as shown on Figure 8. Existing transmission lines and substations are also within 10 miles of the Facility. No other existing energy generation facilities have been identified within 10 miles of the Facility.

Exhibit H. Non-generating Energy Facility – OAR 345-020-0011(1)(h)

*(h) **Exhibit H.** If the proposed facility is a non-generating energy facility for which the applicant must demonstrate need under OAR 345-023-0005, identification of the rule in division 23 of this chapter under which the applicant intends to demonstrate need and a summary statement of the need and justification for the proposed facility.*

Response:

The Facility is not a non-generating energy facility. Therefore, this rule is not applicable.

Exhibit I. Land Use – OAR 345-020-0011(1)(i)

*(i) **Exhibit I.** A statement indicating whether the applicant intends to satisfy the Council's land use standard, OAR 345-022-0030, by obtaining local land use approval under ORS 469.504(1)(a) or by seeking a Council determination under ORS 469.504(1)(b).*

Response:

The proposed Facility site boundary is within Gilliam County's EFU zoning district (Figure 3). The Applicant intends to satisfy EFSC's land use standard, OAR 345-022-0030, by seeking an EFSC determination under ORS 469.504(1)(b) of compliance with Gilliam County's land use standards for the Facility.

Exhibit J. Environmental Impacts – OAR 345-020-0011(1)(j)

*(j) **Exhibit J.** Identification of potential significant environmental impacts of construction and operation of the proposed facility on resources in the study areas, including those impacts affecting air quality, surface and ground water quality and availability, wildlife and wildlife habitat, threatened and endangered plant and animal species, historic, cultural and archaeological resources, scenic resources, recreation opportunities, land use, and wildfire risk.*

Response:

This exhibit addresses the potential environmental impacts of Facility construction and operation on air quality; surface and groundwater quality and availability (including waters of the state); wildlife and wildlife habitat; threatened and endangered plant and animal species; historic, cultural, and archaeological resources; scenic resources (including protected areas); recreation; land use; and wildfire risk. The following discussions are based on the study area for each resource, as defined in OAR 345-001-0010(35) and shown in Figure 4. The study area and related regulatory requirements for each resource are identified in Table J-1.

Table J-1. Study Areas for Environmental Impacts

Resource	Study Area	Regulatory Requirement
Air Quality	Facility site boundary	Not applicable
Surface and Groundwater Quality and Availability (includes waters of the state)	Facility site boundary	Not applicable
Fish and Wildlife Habitat	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)
Threatened and Endangered Plant and Animal Species	5 miles from Facility site boundary	OAR 345-001-0010(35)(a)
Historic, Cultural and Archaeological Resources	Facility site boundary	Not applicable
Scenic Resources	10 miles from Facility site boundary	OAR 345-001-0010(35)(b)
Recreation	5 miles from Facility site boundary	OAR 345-001-0010(35)(d)
Land Use	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)
Wildfire Risk	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)

Air Quality

The primary sources of air pollution during construction and operation of the Facility are pollutants coming from the emissions of vehicles traveling to and from the Facility and fugitive dust. The wind turbines, collector lines, BESS, and related and supporting components will not produce air

contaminants and therefore will not have a negative impact on air quality in the area. Generally, vehicles traveling to and from the site will include large trucks carrying various materials and employees commuting to the site. Fugitive dust can be generated from vehicles driving on unpaved gravel roads. Dust control best management practices, which will be thoroughly discussed in the ASC, will be implemented during construction to minimize the effects of dust.

Because vehicles and dust generated during construction and operations are mobile, temporary, and non-point sources, they are not subject to air quality permitting. Facility-related vehicles, workers' vehicles, and vehicles used for delivery of construction supplies and equipment or operational supplies are subject to ODOT and U.S. Department of Transportation regulations for registration and emissions. Facility construction equipment will be subject to the federal non-road engine standards in 40 CFR Part 1039 (National Archives 2025). These standards establish the maximum allowable emission rates for compression ignition non-road engines based on the model year of the engine.

Surface and Groundwater

Surface and Groundwater Quality

Pollutants will not be discharged from the Facility to surface water or groundwater. The Applicant will obtain a NPDES 1200-C permit from ODEQ to address potential impacts from construction stormwater runoff. The NPDES 1200-C permit will include an Erosion and Sediment Control Plan to minimize impacts from stormwater runoff. If a temporary concrete batch plant is needed for construction, the Facility will also obtain NPDES 1200-A and WPCF-1000 permits from ODEQ to address potential discharges.

During construction, employees will use on-site portable toilets; waste will be disposed of off-site by a licensed contractor. During operation, the O&M building will be served by a septic system and water is anticipated to be provided by an on-site well permitted for Facility use or nearby municipalities with existing water rights.

Surface and Groundwater Availability

During Facility construction, water will be primarily used for dust suppression and road and earthwork compaction. Water is anticipated to come from wells permitted for Facility use and/or nearby municipalities with existing water rights. The Applicant will confirm with the appropriate municipality that the anticipated amount of water needed for construction of the Facility will be available. Actual daily water use will vary depending on weather and the final construction schedule. For example, water usage for dust control will be greater during the dry, windy conditions of summer than at other times of year. The expected water amounts used for construction of the Facility will be discussed in the ASC.

During construction, the construction contractor will be responsible for identifying water sources, as needed, and ensuring that any needed permits or approval are obtained for construction water

use. Water will either be used immediately or stored in a tank or holding pond. Water use during construction is not expected to reduce any existing surface or groundwater availability or exceed the amount of water available for beneficial use within the watersheds in which the Facility is located.

During operations, water may be provided by an on-site well permitted for Facility use or nearby municipality or permitted off-site wells with existing water rights. Generally, water during operation will be used within the O&M building, washing Facility vehicles, and for service road maintenance. The average amount of water used at the O&M building will be less than 5,000 gallons per day during operations.

Wetlands and Waters of the State of Oregon

Potential wetlands and waters have been identified in Figure 7 using data from the NWI and NHD. Intermittent and perennial streams (as categorized by NHD) cross through and around the boundary; the site boundary also contains a few areas along the eastern border categorized as playa and one small area in the southwestern portion of the site categorized as lake/pond. The NWI identified one riverine feature intersecting the southern portion of the site boundary. An in-depth analysis of wetlands and waters will be provided in the ASC including the wetland and waters delineation, discussion of the potential impacts to potentially jurisdictional wetlands and waters, including required mitigation (if any), and identification of necessary permits.

Wildlife and Wildlife Habitat

As shown in Table J-2, according to the National Land Use Cover Database, land cover within the Facility site boundary is primarily Grassland/Herbaceous cover (MRLC 2024). The site boundary also contains areas of Cultivated Crops, Shrub/Scrub, Pasture/Hay, and Developed lands in varying levels of development (Open Space, Low Intensity, and Medium Intensity).

Table J-2. Land Cover within the Facility Site Boundary

Land Cover Type	Area (acres) ¹	Percent of Total Area ¹
Developed - Open Space	247	2.16%
Developed - Low Intensity	15	0.13%
Developed - Medium Intensity	8	<0.1%
Shrub / Scrub	1,541	13.48%
Grassland / Herbaceous	7,371	64.50%
Pasture / Hay	15	0.13%
Cultivated Crops	2,231	20%
Total	11,429	100.00%
1. Values may not add up to the total due to rounding.		

The Applicant will complete special status wildlife surveys to determine what species are present within the site boundary. Habitat categorization surveys will also be completed to assess habitat functions and value to support wildlife within the Facility site boundary. Habitat surveys will be guided by the Oregon Department of Fish and Wildlife (ODFW) Fish and Wildlife Habitat Mitigation Policy (OAR 635-415-0025), which defines six habitat quality categories ranging from Category 1 habitat (i.e., essential, limited, and irreplaceable habitat) to Category 6 habitat (i.e., habitat that has low potential to become essential or important habitat for fish and wildlife). The ASC will provide a more in-depth analysis of specific species and their habitats.

Sensitive, Threatened, and Endangered Species

Biological surveys for special status wildlife and plant species will be conducted within the Facility site boundary in coordination with ODFW. A raptor and eagle nest survey will be conducted within the Facility site boundary and within a 0.5-mile buffer around the Facility site boundary. According to the Applicant's review of desktop resources, there is potential for one federally listed wildlife species to occur within or near the Facility site boundary, bull trout (*Salvelinus confluentus*, federally threatened) (USFWS 2024), and two state-listed and candidate wildlife species to occur within or near the Facility site boundary: Washington ground squirrel (*Urocitellus washingtoni*, state endangered) and steelhead trout (*Oncorhynchus mykiss*, state candidate) (ORBIC 2025). Further, two state-listed and candidate plant species were identified to potentially occur within the vicinity of the Facility site boundary: Lawrence's milkvetch (*Astragalus collinus* var. *laurentii*, state threatened) and sessile mousetail (*Myosurus sessilis*; state candidate) (ODA 2025, ORBIC 2025). A portion of the southern Facility site boundary overlaps with areas identified by ODFW as potential winter range for mule deer (*Odocoileus hemionus*), while no portion of the site boundary overlaps with potential winter range for Rocky Mountain elk (*Cervus elaphus nelson*) (ODFW 2013).

Results of field surveys and analysis of potential impacts to sensitive, threatened, and endangered species will be provided in the ASC, along with measures to reduce any anticipated impacts to these species, if necessary.

Archaeological, Historical, and Cultural Resources

The Applicant will conduct cultural resource surveys within the Facility site boundary. These surveys will evaluate the presence or absence of cultural resources that may or may not meet the threshold of significance necessary to qualify them for listing on the National Register of Historic Places. Oregon State Historic Preservation Office study methodologies will be followed and be consistent with U.S. Secretary of Interior standards for cultural resource surveys under Section 106 of the National Historic Preservation Act (Public Law 89-665).

Any archaeological, historical, or cultural sites discovered during the field investigation will be officially documented and submitted to the Oregon State Historic Preservation Office. If such a resource is identified, the Applicant will make every effort to avoid it or undertake mitigation measures to avoid significant impacts.

Scenic Resources

The study area for scenic and aesthetic resources consists of the area within the Facility site boundary plus a 10-mile buffer around the site boundary in accordance with OAR 345-001-0010(35)(b) (see Figure 4). Pursuant to OAR 345-022-0080(3) and 5(a), scenic resources to be considered are those “identified as significant or important in a land use management plan adopted by one or more local, tribal, state, regional, or federal government or agency applicable to lands within the analysis area for scenic resources.”

Regional land use plans to be considered include the Gilliam County Comprehensive Plan and other local comprehensive plans for jurisdictions within 10 miles of the Facility site boundary (Gilliam County 2022). The visual assessment included with the ASC will include proposed mitigation measures, if needed, for significant potential impacts identified through the ASC process.

Recreational Opportunities

The recreational opportunities study area consists of the Facility site boundary plus a surrounding 5-mile buffer (Figure 4), in accordance with OAR 345-001-0010(35)(d). Generally, recreational activities in the study area include water recreation and sightseeing (Gilliam County 2022, Gilliam County 2025a, Google Earth 2025). The Recreation Exhibit in the ASC will include a specific analysis of the impacts to recreational opportunities within the study area. These recreational opportunities will be evaluated for several factors, including rareness and irreplaceability, as required by OAR 345-022-0100(2).

Land Use

As shown on Figure 4, the study area for land use consists of the area within the Facility site boundary plus a surrounding 0.5-mile buffer in accordance with OAR 345-001-0010(35)(c). As shown in Figure 3, the Facility’s site boundary is exclusively within Gilliam County’s EFU zone. Applicable development standards for this land use zone and applicable overlay zones will be addressed in the Land Use Exhibit of the ASC. Land within the site boundary is primarily vacant with some agricultural activities, which may include livestock grazing and crop cultivation. Impacts to agricultural land will also be further discussed in the Land Use Exhibit of the ASC.

Wildfire Risk

The study area for wildfire risk consists of the area within the Facility site boundary plus a surrounding 0.5-mile buffer, in accordance with OAR 345-001-0010(35)(c) (see Figure 4). The Oregon Community Wildfire Protection Planning Tool shows the study area as having a moderate to very high wildfire risk (Oregon Explorer 2025). During construction, water trucks will be on-site for dust management and can provide water to support fire control if needed. The wildfire exhibit of the ASC will provide a detailed analysis of baseline fire risk, seasonal fire risk, heightened risk area,

and high fire consequence areas for the study area. The Applicant will coordinate with the North Gilliam County Rural Fire Protection District (RFPD) during ASC development and continue to do so through all stages of Facility development. In addition, the Applicant will develop and implement a Wildfire Mitigation Plan in compliance with OAR 345-022-0115(1)(b).

Exhibit K. Community Service Impacts – OAR 345-020-0011(1)(k)

(k) Exhibit K. Information about significant potential adverse impacts of construction and operation of the proposed facility on the ability of communities in the study area to provide the services listed in OAR 345-022-0110.

Response:

Pursuant to OAR 345-001-0010(35)(b), the public services study area for impacts includes the Facility site boundary plus a surrounding 10-mile buffer. Public services that will be evaluated for potential impacts from the construction and operation of the Facility are listed in OAR 345-022-0110(1) and outlined below:

- Sewers and sewage treatment;
- Water;
- Storm water drainage;
- Solid waste management;
- Housing;
- Traffic safety;
- Police and fire protection;
- Health care; and
- Schools.

Sewers and Sewage Treatment

Sewage treatment on-site is limited to an on-site septic system. During construction, sanitary waste will be collected on-site in portable toilets that will be provided and maintained by a licensed subcontractor. A septic system will be necessary to support the O&M building, which will contain a kitchen and bathroom. Required permits to construct the system will be obtained from Umatilla County on behalf of Gilliam County and ODEQ. The septic system will not rely on community services and will not cause significant adverse impacts to community sewer systems.

Water

During Facility construction, water will primarily be required for dust suppression, access roads, and earthwork compaction. Actual daily water use will vary depending on weather and the final

construction schedule. The need for water for dust control, for example, will be far greater in dry, windy summer conditions than at other times of year.

Water used during construction is anticipated to come from wells permitted for Facility use or from nearby municipalities with existing water rights, such as the City of Condon, City of Arlington, and City of Boardman. The Applicant will confirm the anticipated amount of water required for construction and operation and will provide additional detail on water sourcing and use in the ASC.

During operation of the Facility, water will primarily be used for washing Facility components, drinking, kitchen use, showers, shop sinks, and toilets. The Applicant will construct either an exempt well, allowed under ORS 537.545, or obtain water from a municipal water source or off-site permitted well with existing water rights for the O&M building. Generally, water used during operation of the Facility at the O&M building and for service road maintenance is anticipated to be less than 5,000 gallons per day.

During Facility construction and operation, water will only be obtained from permitted sources with adequate water rights. Therefore, public water systems will not be adversely affected by construction or operation of the Facility.

Stormwater Drainage

Due to the rural nature of the proposed Facility, there is minimal existing stormwater infrastructure in the area except for existing drainage ditches alongside public roads. Thus, the proposed Facility will not have significant adverse impacts on stormwater drainage services or infrastructure. Stormwater from access roads is expected to be minimal and will flow to the adjacent ground and infiltrate on-site.

The Applicant will obtain an NPDES 1200-C Permit for the Facility and will handle stormwater according to the terms of the permit and accompanying Erosion and Sediment Control Plan. Stormwater will be handled in accordance with the terms of the permit and on site, typically using retention and infiltration systems. These facilities will be located on private land and will not affect the provision of stormwater management services by any public agency. There are no incorporated communities located within the Facility site boundary. Thus, the Facility will have no impact on stormwater drainage services provided in more urban communities in the area.

Solid Waste Management

The Dalles Disposal provides waste management for Gilliam County and collects non-hazardous solid waste including trash, cardboard, organics, recycling, and construction and demolition debris (The Dalles Disposal 2025). Solid waste generated at the Facility during construction activities will be non-hazardous. Waste materials generated through the construction of the wind turbines and associated infrastructure will consist of scrap metal, concrete waste, and packaging materials. Disposal of this waste will be provided through a private contract with local commercial haulers. Waste that cannot be recycled or sold for reuse will be disposed of at a regional landfill. The closest

landfill to the site boundary is the Columbia Ridge Landfill, located along the northeastern border of the site (WM Northwest 2025).

The O&M building will generate small quantities of solid waste during operation of the Facility. Typical waste will include plastic, paper, and food. Replacement of equipment throughout the lifetime of the Facility will produce waste such as scrap metal. Any disposal of lithium ion batteries from the BESS will be conducted by an external licensed hazmat contractor or the original equipment manufacturer, depending on the services agreement for the BESS.

Prior to submitting the ASC, the Applicant will coordinate with waste management service providers to confirm that they are able to meet the waste management needs of the proposed Facility.

Housing

Construction

The Applicant anticipates an average of 200 employees will be present on-site during construction. This number will fluctuate during periods when multiple teams of contractors perform their work simultaneously. The Applicant estimates that a maximum of 300 employees will be on-site at one time during periods of the highest activity.

The construction workforce will include a wide variety of specialized workers for certain construction tasks. Construction workers hired from outside the local area will need temporary housing. The amount of temporary housing needed will depend on the percentage of workers hired from outside of the local area. The percentage of the construction workforce hired locally will depend on the availability of workers with appropriate skills. For construction workers hired non-locally, there are several options for temporary housing in areas within a commutable distance to the site, such as the cities of Arlington, Condon, and Wasco. Since a portion of the temporary workers will be hired locally, the Applicant does not anticipate a significant impact on housing within the 10-mile study area. Due to the number of regional communities that workers can choose from for housing, the impact on housing in the immediate vicinity of the Facility is anticipated to be reduced. Workers from outside the area will benefit local businesses with their patronage for housing, food, or other daily needs. The Applicant is also considering options for incorporating temporary workforce housing and will describe these in more detail in the ASC.

Operation

It is estimated that fewer than 20 full-time employees will work on-site for the 30-year lifetime of the Facility. Preference will be given to local candidates, but some outside contractors who specialize in maintenance tasks may need to be hired. The Applicant does not anticipate significant impacts to housing in the surrounding community as a result of Facility operation.

Traffic Safety

Primary transportation corridors for the Facility include I-84, OR-19, and Gilliam County local roads. Heavy-duty and light-duty delivery vehicles and workforce traffic will utilize these routes during construction. Generally, heavy-duty trucks will transport gravel, concrete, and larger materials. Light-duty trucks will typically carry people, water, and electrical equipment. During construction of the Facility, traffic through the identified transportation corridors may increase due to the number of trucks and workers needed. The Applicant will enter into a road use agreement with Gilliam County, as needed, to ensure public roads utilized during construction are left in as good or better condition as prior to construction. Additionally, the Applicant will develop a traffic management plan in coordination with Gilliam County to minimize traffic safety impacts.

During operation, significant traffic impacts from the Facility are not anticipated. It is estimated that fewer than 20 full-time employees will work on-site. Preference will be given to hiring local candidates, but some outside contractors who specialize in maintenance tasks may be needed. Delivery trucks may also access the Facility during operation on an infrequent basis. Due to the small number of permanent employees, there will not be significant increases in traffic in the surrounding areas. A detailed analysis of traffic generation resulting from both construction and operation of the Facility will be included in the ASC.

Police and Fire Protection

In Gilliam County, the Gilliam County Sheriff's Office and Oregon State Police Department provide police services. During construction, the Applicant will provide on-site security, and effective communications will be established between on-site security personnel and the Gilliam County Sheriff's Office. The Applicant does not anticipate that the Facility will generate a significant long-term increase in demand for police services, as there are a relatively small number of new permanent residents anticipated to enter the area during operations.

The Facility is located within the North Gilliam County RFPD coverage area (OOSFM 2025). Prior to construction, the Applicant will work with the North Gilliam County RFPD and other relevant fire protection agencies to address potential needs for a fire prevention and management plan during construction. The Applicant will also develop first aid and emergency response procedures for the construction and operation of the Facility. Development of these plans will involve consultation with local emergency response agencies. The Applicant will notify the relevant fire protection agencies of construction plans and identify the location of and access to Facility components. The Facility will be equipped with fire protection equipment in accordance with the Oregon Fire Code. Fire danger during construction will be reduced through implementation of safe working practices, such as maintaining adequate fire-fighting equipment and water supplies on hand during operations that carry a high fire risk, conducting welding within a cleared or graveled area, preventing parking of vehicles in areas with high, dry grass, and through implementation of construction and operations Wildfire Mitigation Plans, if applicable. Fire danger during the

operational phase of the Facility will be minimal. Therefore, significant new demands on the fire protection forces that serve the area are not anticipated.

Health Care

Due to the lower population density in the area where the Facility is located, hospital and medical centers are regional. The nearest hospitals are Klickitat Valley Health in Goldendale, WA (approximately 26 miles northwest of the Facility), Pioneer Memorial Hospital in Heppner, OR (approximately 35 miles southeast of the Facility), and Adventist Health Columbia Gorge in the Dalles, OR (approximately 40 miles northwest of the Facility).

The project vicinity is within the North Gilliam County Health District, which is served by North Gilliam Medic. North Gilliam Medic provides 24/7 emergency medical services by on-call licensed EMTs who provide basic and intermediate life support services. This service would also transport patients to the closest hospital in the event of an emergency (North Gilliam County Health District 2025).

Impacts to health care services could occur if Facility construction activities or increases in temporary or permanent residents were to increase the use of health care services and thus exceed the capacity of local providers. Impacts on local health care services will be minimized by careful management of site health and safety risks. The small number of new temporary and permanent residents is not expected to place significant new demands on the health care services in the area.

Schools

Education services in Gilliam County are provided by Arlington Community Charter Schools, Honker's Nest Child Care Center, Arlington Community Preschool, Condon School District, Condon Early Learning Center, and the North Central Education Service District (Gilliam County 2025b). The student population may increase slightly during construction of the Facility, depending on the number of non-locally hired employees; however, the Applicant does not expect permanent student increases from construction of the Facility. Operation of the Facility will require fewer than 20 permanent employees. Some employees may be hired locally, and others may relocate from outside the region with their families. Conservatively estimating that all 20 employees are hired from outside the region, and settle near the Facility rather than commuting from larger nearby communities, and on average, each brings two school-age children, up to approximately 40 children could enroll at area schools. Because children would be different ages, the number of children at any one grade level will be very low. Therefore, construction and operation of the Facility are not anticipated to have a significant or negative impact on the school system in Gilliam County.

Exhibit L. Protected Areas – OAR 345-020-0011(1)(L)

*(L) **Exhibit L.** A list of all protected areas in the study area for impacts to protected areas identifying:*

(A) The distance and direction of the protected area from the proposed facility;

(B) The basis for protection of the area, by reference to a specific subsection of OAR 345-001-0010(26); and

(C) The name, mailing address, phone number, and email address of the land management agency or organization with jurisdiction over the protected area;

Response:

The protected areas study area is the Facility site boundary plus a surrounding 20-mile buffer (Figure 6), in accordance with OAR 345-001-0010(35)(e). Protected areas are defined and listed in OAR 345-001-0010(26). Table L-1 lists known protected areas within the study area, which are shown on Figure 6. The Protected Areas Exhibit of the ASC will include more detailed analysis of the potential impacts to protected areas.

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Table L-1. Protected Areas Inventory

Protected Areas within 20 Miles of Facility Site Boundary		Distance to Facility Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Type	Area Name				
National Park or other unit of the National Park System OAR 345-001-0010(26)(a)	None	N/A	N/A	N/A	Google Earth 2025, NPS 2025a, USGS 2024
National Monument OAR 345-001-0010(26)(b)	None	N/A	N/A	N/A	Google Earth 2025, NPS 2025a, USGS 2024
Wilderness Area OAR 345-001-0010(26)(c)	None	N/A	N/A	N/A	Google Earth 2025, USFS 2025a, USFS 2025b, USFS 2025c, USGS 2024, Wilderness Connect 2025
Wild, Scenic, or Recreational River included in the National Wild and Scenic River System OAR 345-001-0010(26)(d)	John Day Wild and Scenic River	4.0	W	Bureau of Land Management (BLM) Prineville District 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	Google Earth 2025, NPS 2025b, National Wild and Scenic Rivers System 2025, USGS 2024
National Wildlife Refuge included in the National Wildlife Refuge System OAR 345-001-0010(26)(e)	None	N/A	N/A	N/A	Google Earth 2025, USFWS 2025b, USGS 2024
National Fish Hatcheries OAR 345-001-0010(26)(f)	None	N/A	N/A	N/A	Google Earth 2025, USFWS 2025b
National Recreation area, National Scenic area, or Special Resources Management Unit OAR 345-001-0010(26)(g)	None	N/A	N/A	N/A	Google Earth 2025, USFS 2025a, USFS 2025b, USFS 2025c, USGS 2024
Wilderness Study Area OAR 345-001-0010(26)(h)	Lower John Day Wilderness Study Area	11.8	SW	BLM Prineville District Office 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	BLM 2025a, Google Earth 2025, USGS 2024

Protected Areas within 20 Miles of Facility Site Boundary		Distance to Facility Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Type	Area Name				
Area of Critical Environmental Concern OAR 345-001-0010(26)(i)(A)	Ferry Canyon Area of Critical Environmental Concern (ACEC)	5.5	SW	BLM, Prineville District 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	BLM 2025b, BLM 2025c, BLM 2025d, BLM 2025e, Google Earth 2025, OPRD 2020, USFS 2025b, USGS 2024
	Horn Butte Curlew ACEC	15.6	NE	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	
Outstanding Natural Area OAR 345-001-0010(26)(i)(B)	None	N/A	N/A	N/A	
Research Natural Area OAR 345-001-0010(26)(i)(C)	None	N/A	N/A	N/A	
Experimental Forest or Range OAR 345-001-0010(26)(i)(D)	None	N/A	N/A	N/A	
Special Interest Area designated for scenic, geologic, botanic, zoologic, paleontological, archaeological, historic, or recreational values, or combinations of these values OAR 345-001-0010(26)(i)(E)	None	N/A	N/A	N/A	
State park, wayside, corridor, monument, historic, or recreation area under the jurisdiction of the Oregon Parks and Recreation Department OAR 345-001-0010(26)(j)	Cottonwood Canyon State Park	5.5	SW	Oregon Parks and Recreation Department (OPRD) 725 Summer Street NE, Suite C Salem, OR 97301 (541) 394-0002 park.info@oregon.gov	Google Earth 2025, OPRD 2025a, USGS 2024, State of Oregon 2024
Willamette River Greenway OAR 345-001-0010(26)(k)	None	N/A	N/A	N/A	Google Earth 2025, OPRD 2025b
Natural area listed in the Oregon Register of Natural Areas OAR 345-001-0010(26)(L)	None	N/A	N/A	N/A	Google Earth 2025, OPRD 2020, USGS 2024
South Slough National Estuarine Research Reserve OAR 345-001-0010(26)(m)	None	N/A	N/A	N/A	Google Earth 2025, NOAA 2025

Protected Areas within 20 Miles of Facility Site Boundary		Distance to Facility Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Type	Area Name				
State Scenic Waterway OAR 345-001-0010(26)(n)	John Day State Scenic Waterway	4.4	W	N/A	Google Earth 2025, OPRD 2025c, OPRD 2025d, USGS 2024
State Wildlife Refuge or Management Area OAR 345-001-0010(26)(o)	Willow Creek Wildlife Area	14.0	NE	Oregon Department of Fish and Wildlife (ODFW) Willow Creek Wildlife Area 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Google Earth 2025, ODFW 2025a, USGS 2024
Fish hatchery operated by the Oregon Department of Fish and Wildlife OAR 345-001-0010(26)(p)	None	N/A	N/A	N/A	Google Earth 2025, ODFW 2025b
Agricultural experiment station, experimental area, or research center established by Oregon State University OAR 345-001-0010(26)(q)	None	N/A	N/A	N/A	Google Earth 2025, OSU 2025a
Research forest established by Oregon State University OAR 345-001-0010(26)(r)	None	N/A	N/A	N/A	Google Earth 2025, OSU 2025b

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Exhibit M. Water Sources and Use – OAR 345-020-0011(1)(m)

(m) Exhibit M. Information about anticipated water use during construction and operation of the proposed facility, including:

(A) A description of each source of water and the applicant's estimate of the amount of water the facility will need from each source;

Response:

Information regarding the anticipated water use during construction and operation of the proposed Facility is described below.

Construction

During Facility construction, water will primarily be required for dust suppression and access road and earthwork compaction. Actual daily water use will vary depending on weather and the final construction schedule. The need for water for dust control, for example, will be far greater in dry, windy summer conditions than at other times of year.

Water used during construction is anticipated to come from wells permitted for Facility use or from nearby municipalities with existing water rights. The Applicant will confirm the anticipated amount of water required for construction and operation and will provide additional detail on water sourcing and use in the ASC.

Operation

Water use during operation of the Facility will be for washing Facility components and vehicles, drinking, kitchen use, showers, shop sinks, toilets, and service road maintenance. Less than 5,000 gallons per day is expected to be used for operations. This water will be provided from an existing well permitted for Facility use or nearby municipality. The Applicant may also construct an exempt on-site well allowed under ORS 537.545.

(B) If a new water right is required, the approximate location of the points of diversion and the estimated quantity of water to be taken at each point; and

Response:

At this time, the Applicant does not anticipate that the Facility will require new water rights.

(C) For operation, the source of cooling water and the estimated consumptive use of cooling water, based on annual average conditions.

Response:

The Facility is a wind power generation facility. No cooling water is required for operation.

Exhibit N. Carbon Dioxide Emissions – OAR 345-020-0011(1)(n)

*(n) **Exhibit N.** If the proposed facility would emit carbon dioxide, an estimate of the gross carbon dioxide emissions that are reasonably likely to result from the operation of the facility and a statement of the means by which the applicant intends to comply with the applicable carbon dioxide emissions standard under OAR 345-024-0500.*

Response:

The Facility will not emit carbon dioxide. Therefore, these rules are not applicable.

Exhibit O. Evaluation of Statutes, Rules, and Ordinances – OAR 345-020- 0011(1)(o)

*(o) **Exhibit O.** Identification, by legal citation, of all state statutes and administrative rules and local government ordinances containing standards or criteria that the proposed facility must meet for the Council to issue a site certificate, other than statutes, rules and ordinances identified in Exhibit E, and identification of the agencies administering those statutes, administrative rules and ordinances. The applicant must analyze and describe any problems the applicant foresees in satisfying the requirements of any such statute, rule or ordinance.*

Response:

The applicable state statutes, administrative rules and ordinances are listed below in Table O-1. These statutes, rules, and local ordinances contain standards or criteria that must be met by the Applicant for EFSC to issue a site certificate beyond what is listed in Exhibit E of this NOI. The Applicant does not anticipate problems in meeting specific requirements.

Table O-1. Statutes, Rules, and Ordinances Containing Relevant Standards or Criteria

Department	Legal Citation	Agency Address
Oregon Department of Agriculture	OAR 345-022-0070 Threatened and Endangered Species Plant Conservation Biology Program— ORS 564.105; OAR Chapter 603, Division 73	Oregon Department of Agriculture 635 Capitol Street NE Salem, OR 97301 (503) 986-4550
Oregon Department of Aviation	OAR 345-022-0000 General Standard of Review ORS 836.530 and 836.535; OAR Chapter 738, Division 70	Oregon Department of Aviation 3040 25th Street SE Salem, OR 97302 (503) 378-4880
Oregon Department of Fish and Wildlife	OAR 345-022-0060 Fish and Wildlife Habitat and OAR 345-022-0070 Threatened and Endangered Species ORS 496-497; ORS 506, Divisions 109 and 119; OAR Chapter 635, Divisions 100 (Wildlife Management Plan) and 415 (Fish and Wildlife Habitat Mitigation Policy)	Oregon Department of Fish and Wildlife Headquarters The Dalles Fish Screens and Field Office 3561 Klindt Drive The Dalles, OR 97058 (541) 296-8026

Department	Legal Citation	Agency Address
Oregon Water Resources Department – Water Rights Division	OAR 345-022-0160(1) General Standards for Siting Facilities ORS Chapter 537 (Appropriation of Water Generally); ORS Chapter 540 (Distribution and Storage of Water); OAR Chapter 690 (Water Resources Department)	Oregon Water Resources Department Water Rights Section, District 21 221 S Oregon Street Condon, OR 97823 (541) 969-8799
Oregon Department of State Lands	OAR 345-022-0160(1) General Standards for Siting Facilities OAR Chapter 141	Oregon Department of State Lands 775 Summer St. NE, Suite 100 Salem, OR 97301-1279 (503) 986-5200
Oregon Department of Environmental Quality —Water Quality & Stormwater Control	OAR 345-022-0022 Soil Protection ORS 468 and 468B; OAR Chapter 340, Divisions 41, 45, and 55	Oregon Department of Environmental Quality 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255
Oregon Department of Environmental Quality —Noise	OAR 345-022-0160(2) General Standards for Siting Facilities ORS 467 (Noise Control) and OAR Chapter 340, Division 35 (Noise Control Regulations)	Oregon Department of Environmental Quality 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255
Oregon Department of Environmental Quality —Hazardous Waste Management	OAR 345-022-0120 Waste Minimization ORS Chapters 465 and 466 (Hazardous Waste and Hazardous Materials I and II); and OAR Chapter 340, Divisions 100 through 122 (Hazardous Waste Management)	Oregon Department of Environmental Quality 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255
Oregon Department of Environmental Quality —Solid Waste	OAR 345-022-0120 Waste Minimization ORS Chapter 459 (Solid Waste Management) and OAR Chapter 340, Division 93 (Solid Waste General Provisions)	Oregon Department of Environmental Quality 400 E Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255
Oregon Department of Geology and Mineral Industries	OAR 345-022-0020 Structural Standard OAR Chapter 632, Division 1	Oregon Department of Geology and Mineral Industries 800 NE Oregon Street, Suite 965 Portland, OR 97232 (971) 673-1555

Department	Legal Citation	Agency Address
Oregon Parks and Recreation Department, State Historic Preservation Office —Archaeological	OAR 345-022-0090 Historic, Cultural and Archaeological Resources ORS 97.740-97.760 (Indian Graves and Protected Objects); ORS 358.920-358.955 (Archaeological Objects and Sites); ORS 390.010 (Outdoor Recreation); ORS 390.235 (Archaeological Sites and Historical Material); and OAR 736-051-0090 (Archaeological Permits)	State Historic Preservation Office 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0690
Oregon Office of State Fire Marshal—Emergency Planning and Community Right to Know Act	OAR 345-022-0115 Wildfire Prevention and Risk Mitigation ORS 453; OAR Chapter 837, Divisions 85 and 95; Fire and Life Safety Regulations, OAR 837, Division 40	Oregon Office of State Fire Marshal 3991 Fairview Industrial Dr SE Salem, OR 97302 (503) 378-3473
Oregon Office of State Fire Marshal	OAR 345-022-0115 Wildfire Prevention and Risk Mitigation 2022 Oregon Fire Code; OAR Chapter 837, Division 40	Oregon Office of State Fire Marshal 3991 Fairview Industrial Dr SE Salem, OR 97302 (503) 378-3473
Oregon Department of Land Conservation and Development	OAR 345-022-0030 Land Use Oregon Statewide Planning Goals ORS Chapter 195 (Local Government Planning Coordination); ORS Chapter 197 (Comprehensive Land Use Planning Coordination); ORS Chapter 215 (County Planning, Zoning, Housing Codes); ORS Chapter 469 (Energy, Conservation Program, Energy Facilities); OAR Chapter 660 (Department of Land Conservation and Development Administrative Rules)	Oregon Department of Land Conservation and Development 635 Capitol Street NE, Suite 150 Salem, OR 97301 (503) 373-0050
Gilliam County Planning Department	OAR 345-022-0030(2)(a) Gilliam County Zoning and Land Development Ordinance	Gilliam County Planning Department 200 City Center Circle PO Box 229 Boardman, OR 97818 (541) 481-9252

Exhibit P. Schedule for Application for Site Certificate – OAR 345-020-0011(1)(p)

(p) Exhibit P. A schedule stating when the applicant expects to submit a preliminary application for a site certificate.

Response:

The Applicant intends to submit the NOI and Preliminary ASC according to the schedule shown in Table P-1.

Table P-1. Proposed Schedule for Application for Site Certificate Submittal

Activity	Anticipated Date
Applicant submits the NOI to ODOE	December 2025
EFSC reviews the NOI, distributes public notice, conducts public information meeting as needed, facilitates comment period, and issues Project Order	December 2025– April 2026
Applicant submits Preliminary ASC to ODOE	Q2 2026

Exhibit Q. Evidence of Consultation with State Commission on Indian Services – OAR 345-020-0011(1)(q)

*(q) **Exhibit Q.** Evidence of consultation with the Legislative Commission on Indian Services to identify each appropriate tribe to consult with regarding the proposed facility's possible effects on Indian historic and cultural resources.*

Response:

The Applicant contacted the Oregon Legislative Commission on Indian Services to identify appropriate Tribes to contact regarding possible effects of the Facility on Indian historic and cultural resources. On June 10, 2025, the Legislative Commission responded with an email identifying the Burns Paiute Tribe, Confederated Tribes of the Umatilla Indian Reservation, and Confederated Tribes of Warm Springs Reservation of Oregon as Tribal governments that should be notified (Attachment 3).

References

- BLM. 2025a. Wilderness and Wildness Study Areas. Accessed November 2025.
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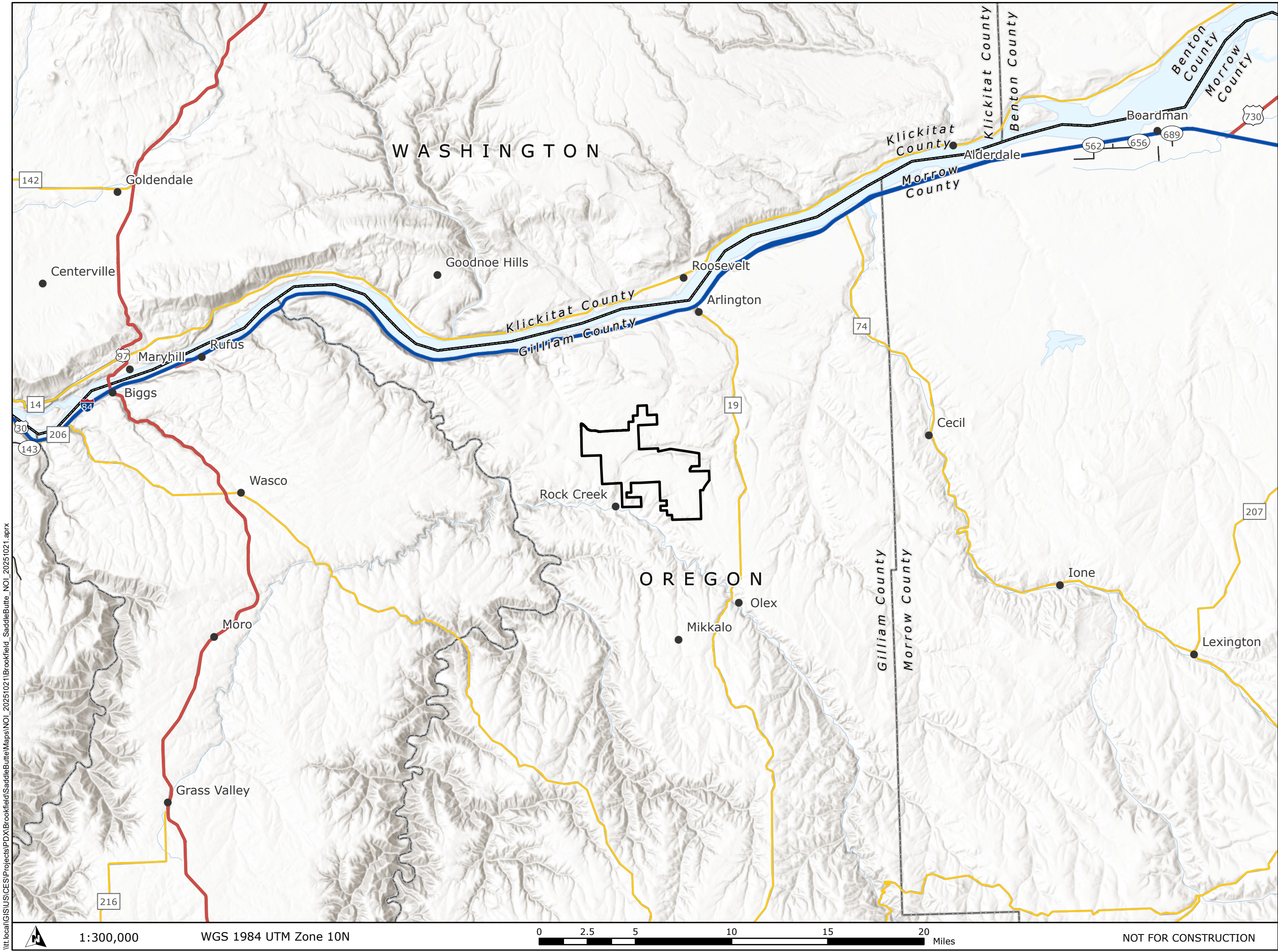
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Figures

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Saddle Butte Energy Facility

Figure 1 Site Vicinity

GILLIAM COUNTY, OR

- Site Boundary
 - City/Town
 - State Boundary
 - County Boundary
 - Interstate Highway
 - US Highway
 - State Highway
 - County Highway
- TETRA TECH** **Brookfield**
Renewable Energy Partners

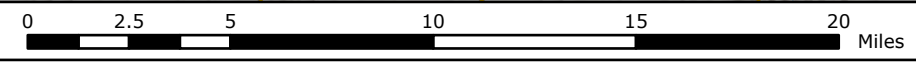


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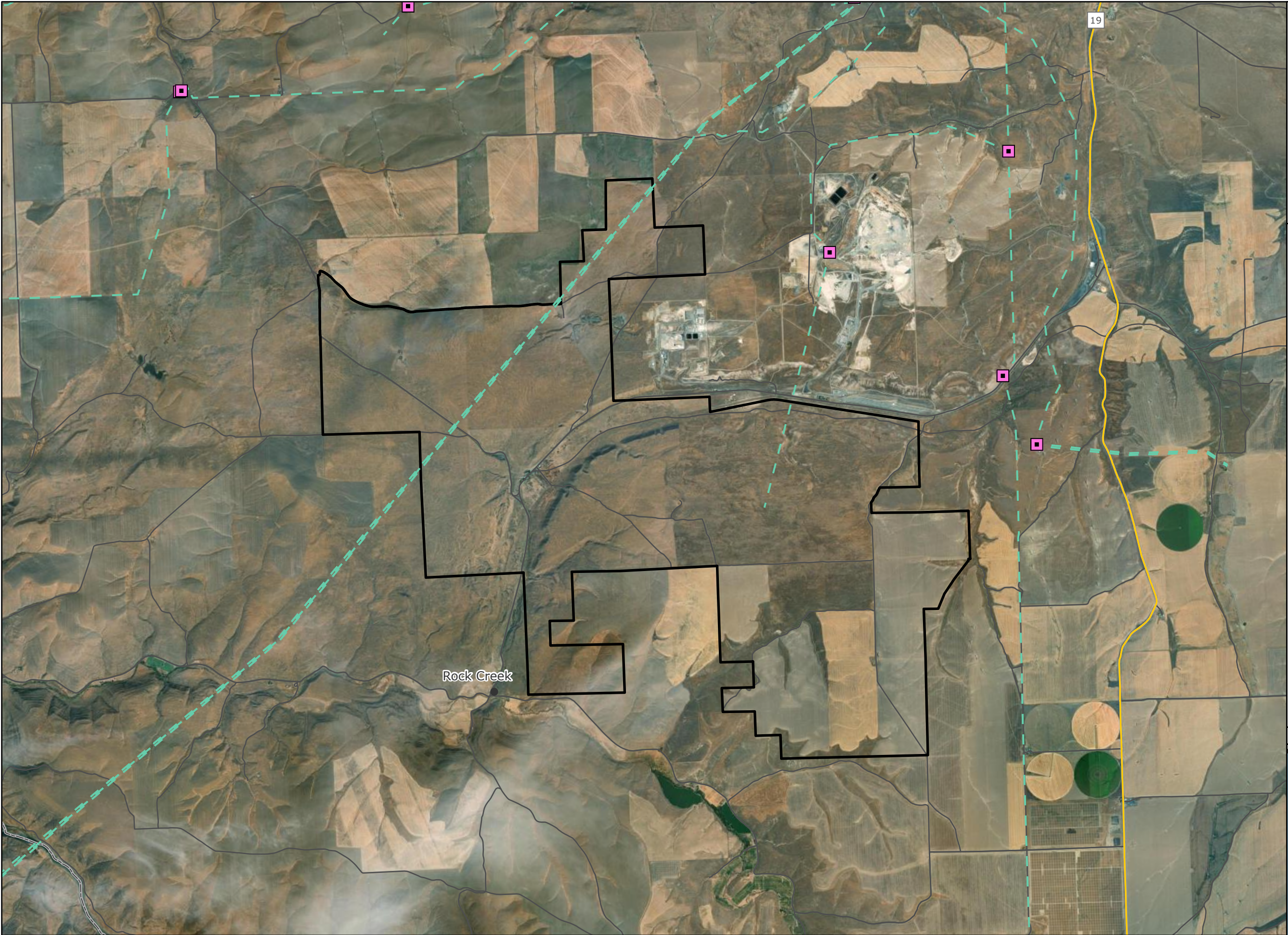
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Saddle Butte Energy Facility

Figure 2
Facility Site Overview

GILLIAM COUNTY, OR

- Site Boundary
- City/Town
- State Highway
- Local Roads
- Existing Substation
- Existing Transmission Line

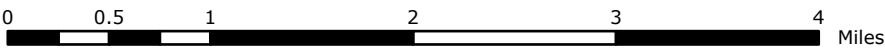


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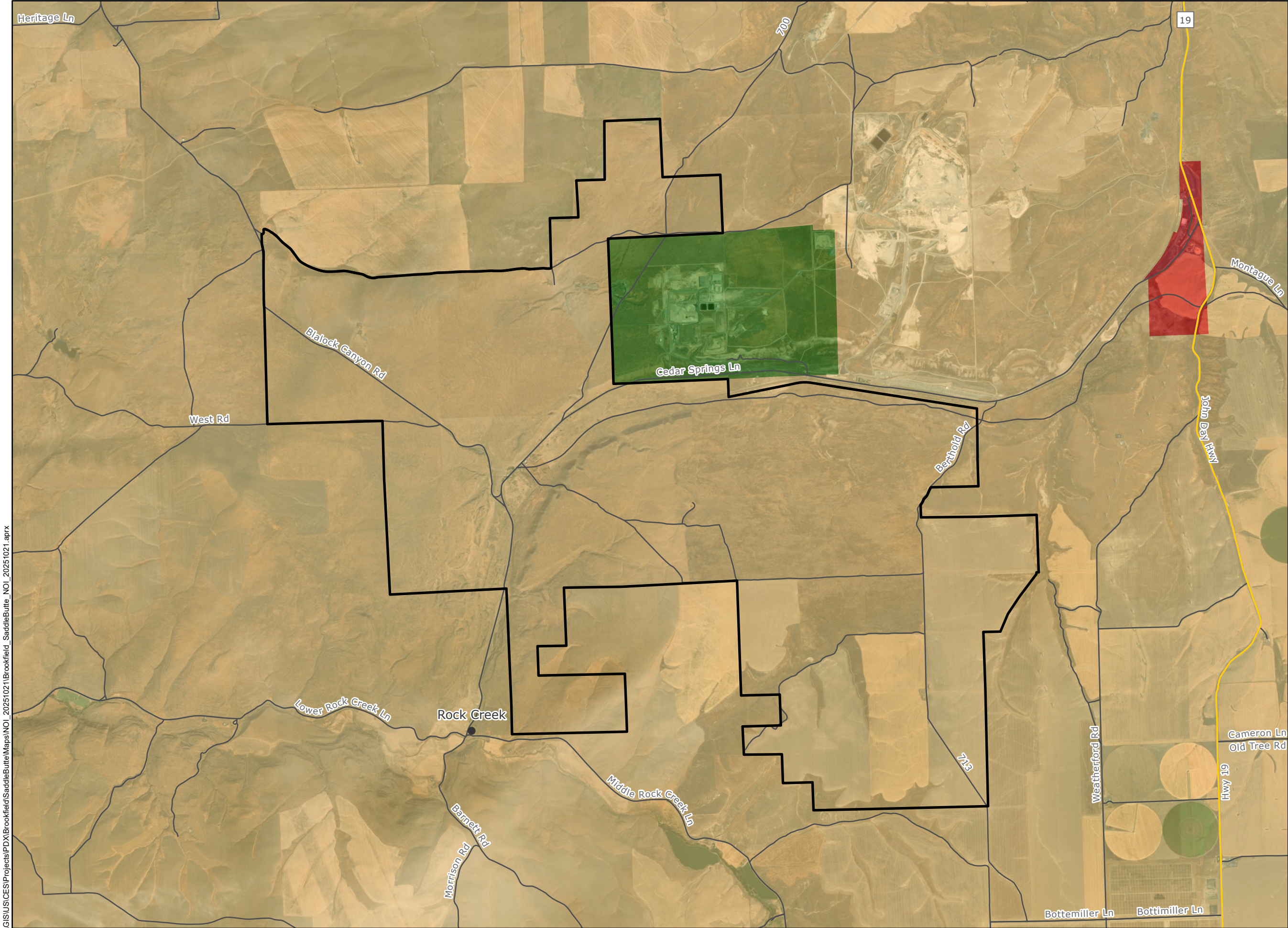


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NOT FOR CONSTRUCTION



Saddle Butte Energy Facility

Figure 3
Zoning

GILLIAM COUNTY, OR

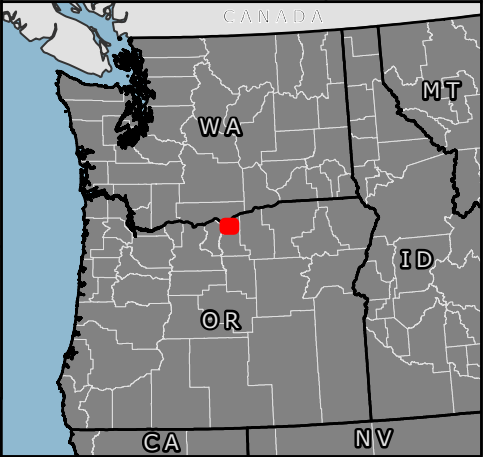
- Site Boundary
- City/Town
- State Highway
- Local Roads

Gilliam County Zoning

- Exclusive Farm Use (EFU)
- General Industrial
- Intermodal Industrial



Reference Map



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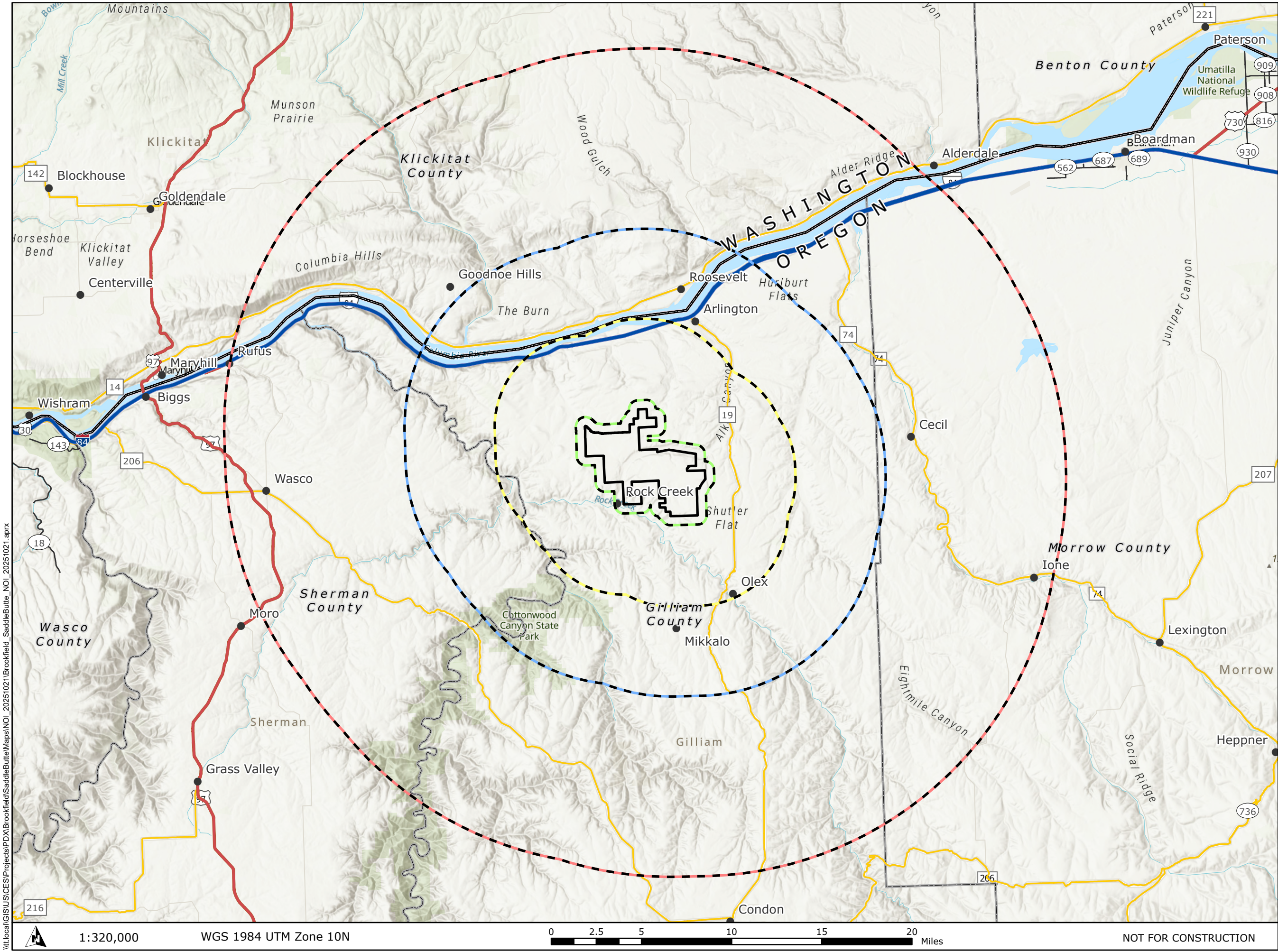


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WGS 1984 UTM Zone 10N

0 0.5 1 2 3 4 Miles

NOT FOR CONSTRUCTION



Saddle Butte Energy Facility

Figure 4 Study Areas

GILLIAM COUNTY, OR

Site Boundary

City/Town

State Boundary

County Boundary

Interstate Highway

US Highway

State Highway

County Highway

Study Areas

0.5 Miles: Land Use; Wildfire Risk; Fish and Wildlife Habitat

5 Miles: Recreational Opportunities; Threatened and Endangered Plant and Animal Species

10 Miles: Scenic Resources and Public Services

20 Miles: Protected Areas

TETRA TECH

Brookfield
Renewable Energy Partners

Reference Map

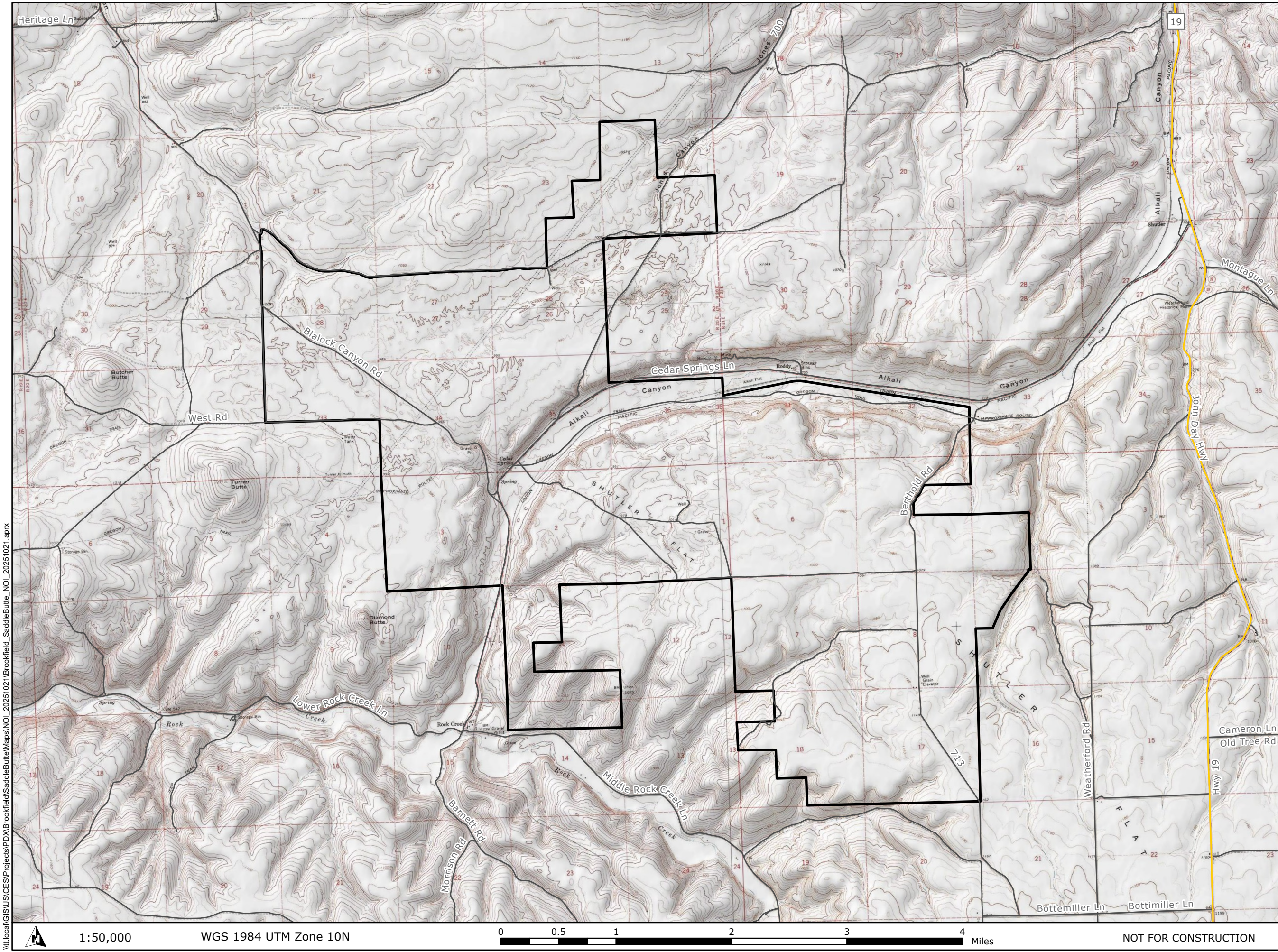
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NOT FOR CONSTRUCTION

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Saddle Butte Energy Facility

Figure 5
Topography

GILLIAM COUNTY, OR

- Site Boundary
- State Highway
- Local Roads



Reference Map



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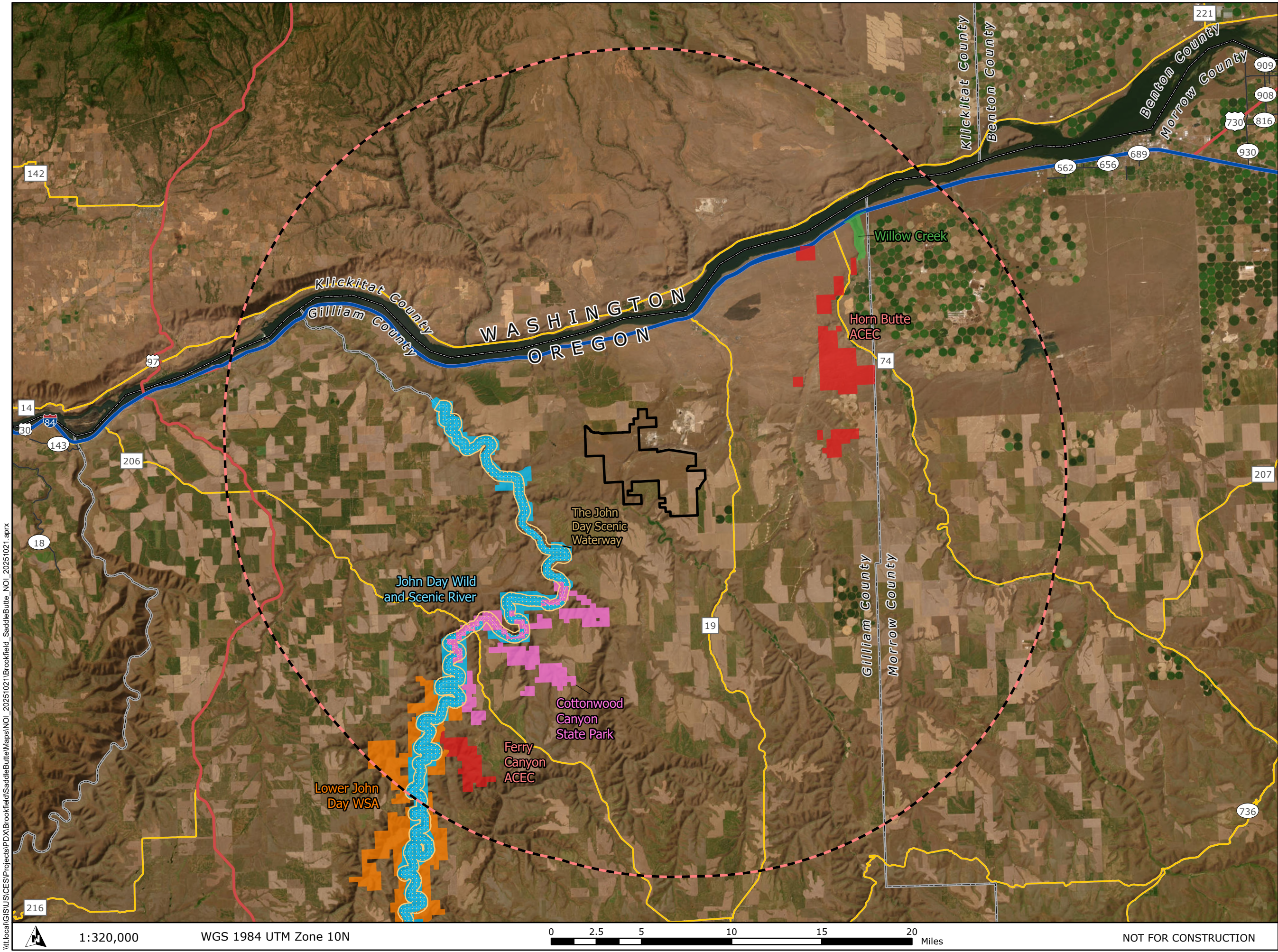


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0 0.5 1 2 3 4 Miles

NOT FOR CONSTRUCTION



Saddle Butte Energy Facility

Figure 6 Protected Areas

GILLIAM COUNTY, OR

Site Boundary

Study Area (20-mile Buffer)

State Boundary

County Boundary

Interstate Highway

US Highway

State Highway

County Highway

Protected Area

Area of Critical Environmental Concern (BLM)

State Park, Wayside, Corridor, Monument, Historic, or Recreation Area (OPRD)

State Wildlife Refuge or Management Area (ODFW)

Wild, Scenic, or Recreational River (BLM)

Wilderness Study Area (BLM)

State Scenic Waterway (OPRD)

TETRA TECH

Brookfield Renewable Energy Partners

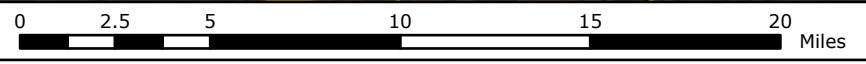
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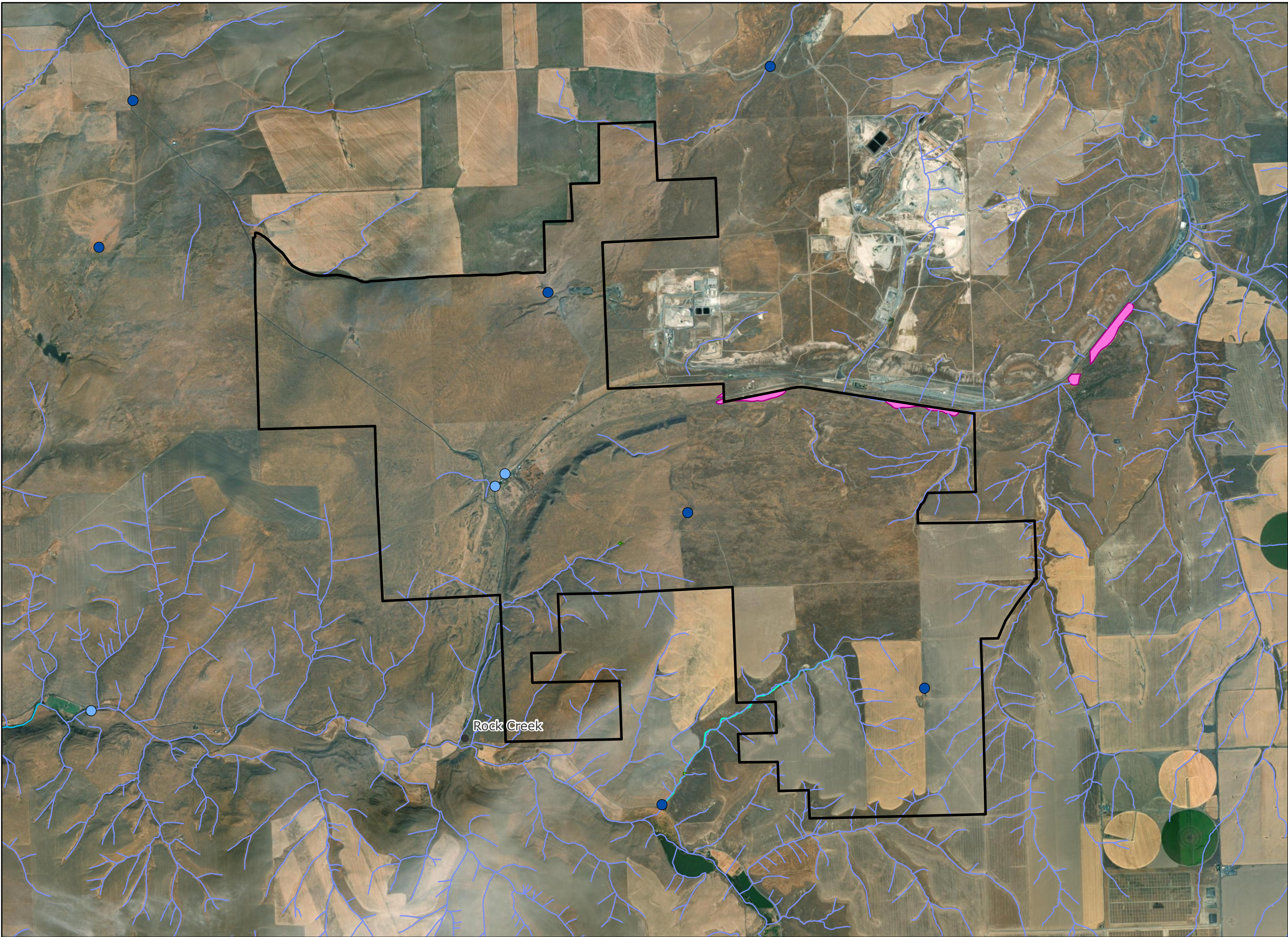
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Saddle Butte Energy Facility

Figure 7
National Wetlands Inventory and National Hydrography Dataset

GILLIAM COUNTY, OR

- Site Boundary
- City/Town
- Waters (NHD)**
 - Spring/Seep
 - Well
 - Intermittent Stream
 - Perennial Stream
 - Playa
 - Lake/Pond
- Wetlands (NWI)**
 - Riverine

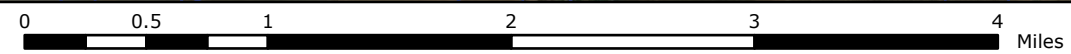


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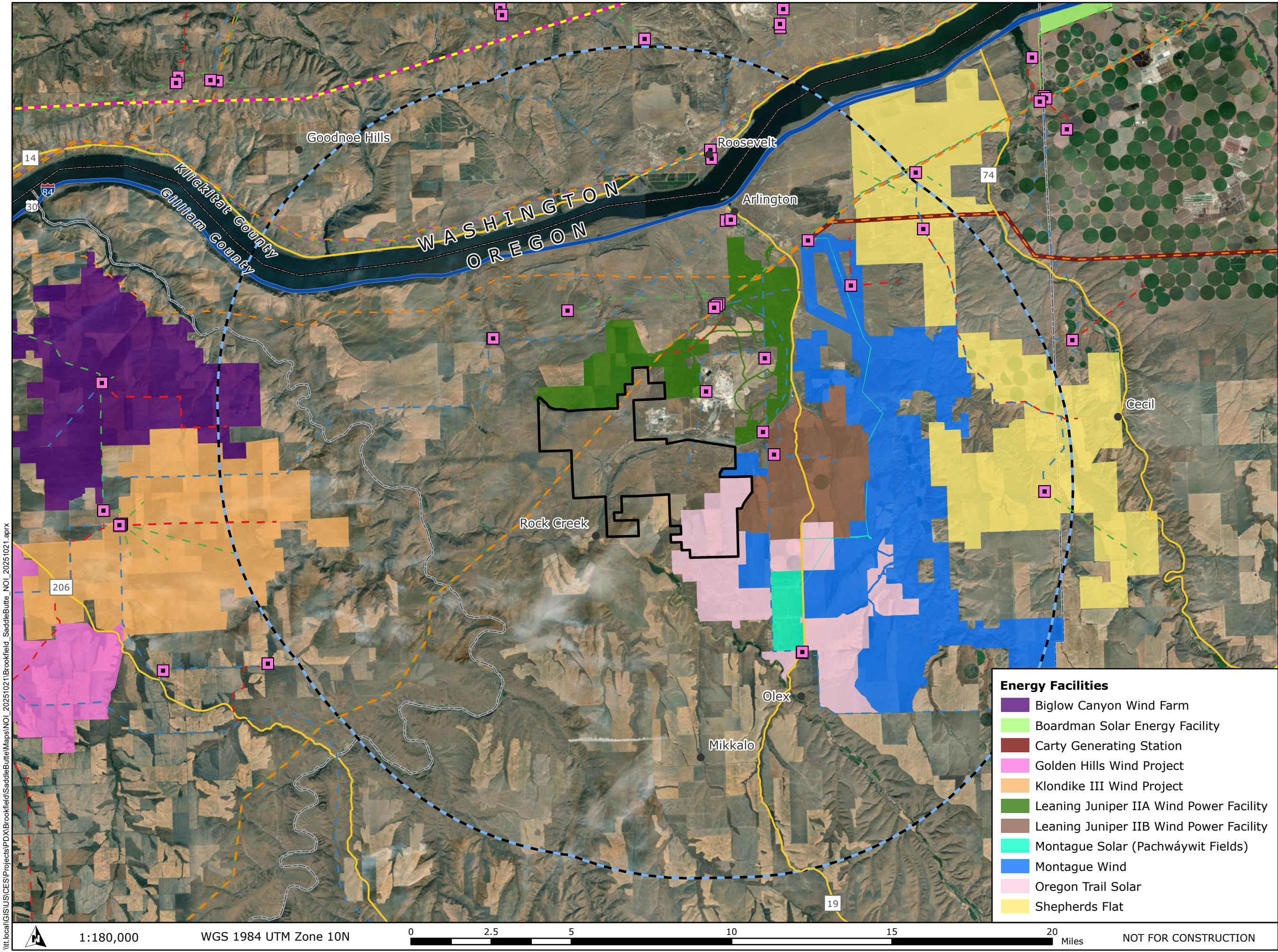


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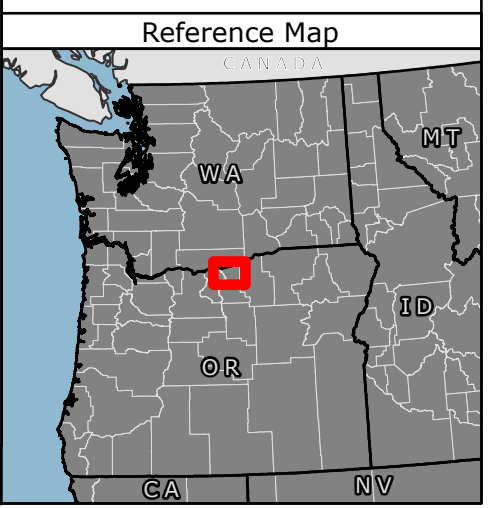
Saddle Butte Energy Facility

Figure 8
Energy Facilities

GILLIAM COUNTY, OR

- Site Boundary
- Study Area (10-mile Buffer)
- City/Town
- Interstate Highway
- US Highway
- State Highway
- State Boundary
- County Boundary
- Existing Energy Infrastructure**
 - Substation
 - <100 kV Transmission Line
 - 100-161 kV Transmission Line
 - 220-287 kV Transmission Line
 - 345 kV Transmission Line
 - 500 kV Transmission Line
 - Natural Gas Pipeline

- Energy Facilities**
- Biglow Canyon Wind Farm
 - Boardman Solar Energy Facility
 - Carty Generating Station
 - Golden Hills Wind Project
 - Klondike III Wind Project
 - Leaning Juniper IIA Wind Power Facility
 - Leaning Juniper IIB Wind Power Facility
 - Montague Solar (Pachwaywit Fields)
 - Montague Wind
 - Oregon Trail Solar
 - Shepherds Flat



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Attachment 1. Articles of Organization

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Delaware

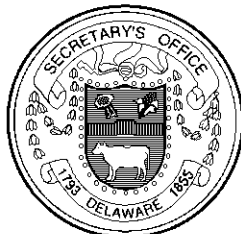
PAGE 1

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "FOURMILE CANYON WIND, LLC", CHANGING ITS NAME FROM "FOURMILE CANYON WIND, LLC" TO "SADDLE BUTTE WIND, LLC", FILED IN THIS OFFICE ON THE TWENTY-SECOND DAY OF JULY, A.D. 2009, AT 10:31 O'CLOCK A.M.

4541343 8100

090717381




Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 7432437

DATE: 07-22-09

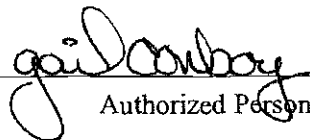
**STATE OF DELAWARE
CERTIFICATE OF AMENDMENT**

1. Name of Limited Liability Company: Fourmile Canyon Wind, LLC

2. The Certificate of Formation of the limited liability company is hereby amended as follows: Article 1 of the Certificate of Formation is hereby replaced in its entirety to read as follows:

"1. The name of the Limited Liability Company is SADDLE BUTTE WIND, LLC."

IN WITNESS WHEREOF, the undersigned have executed this Certificate on the 21st day of July, A.D. 2009.

By: 
Authorized Person(s)

Name: Gail Conboy, Authorized Person
Print or Type

Delaware

PAGE 1

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "FOURMILE CANYON WIND, LLC", FILED IN THIS OFFICE ON THE THIRTIETH DAY OF APRIL, A.D. 2008, AT 6:32 O'CLOCK P.M.



4541343 8100

080490457

You may verify this certificate online
at corp.delaware.gov/authver.shtml

Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 6560499

DATE: 05-01-08

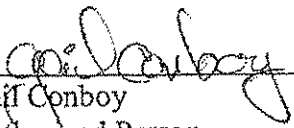
CERTIFICATE OF FORMATION

OF

FOURMILE CANYON WIND, LLC

1. The name of the limited liability company is FOURMILE CANYON WIND, LLC.
2. The name and address of the company's registered agent is: Corporation
Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware
19808.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of
Formation of Fourmile Canyon Wind, LLC on this 30th day of April, 2008.


Gail Conboy
Authorized Person

**STATE OF DELAWARE
CERTIFICATE OF CHANGE OF ADDRESS OF
REGISTERED OFFICE OF REGISTERED AGENT
PURSUANT TO SECTION 134(a) OF TITLE 8
OF THE DELAWARE CODE**

The undersigned Agent for service of process, in order to change the address of the registered office of the corporations for which it is registered agent, hereby certifies that:

1. The name of the registered agent is: _____

CORPORATION SERVICE COMPANY

2. The address of the old registered office was: _____

2711 CENTERVILLE ROAD, SUITE 400

WILMINGTON, DE 19808

3. The address to which the registered office is to be changed is:

251 LITTLE FALLS DRIVE

WILMINGTON, DE 19808

_____ in the county of NEW CASTLE

4. The new address will be effective on: June 19, 2017

IN WITNESS WHEREOF, said agent has caused this certificate to be signed on its behalf by an authorized officer this 30th day of May, 2017 A.D.

CORPORATION SERVICE COMPANY

By: /s/ George A Massih III

Registered Agent/Authorized Officer

Name: George A Massih III, Vice President

Print or Type



Secretary of State
Corporation Division
255 Capitol Street NE, Suite 151
Salem, OR 97310-1327

Phone:(503)986-2200
Fax:(503)378-4381
www.filinginoregon.com

Registry Number: 613659-96
Type: FOREIGN LIMITED LIABILITY COMPANY

Next Renewal Date: 07/01/2010

SADDLE BUTTE WIND, LLC
C/O CAITHNESS CORPORATION
565 FIFTH AVE 29TH FL
NEW YORK NY 10017

Acknowledgment Letter

The document you submitted was recorded as shown below. Please review and verify the information listed for accuracy.

If you have any questions regarding this acknowledgement, contact the Secretary of State, Corporation Division at (503)986-2200. Please refer to the registration number listed above. A copy of the filed documentation may be ordered for a fee of \$5.00. Submit your request to the address listed above or call (503)986-2317 with your Visa or MasterCard number.

Document

AMENDMENT TO AUTHORITY

Filed On

07/22/2009

Jurisdiction

DELAWARE

Name

SADDLE BUTTE WIND, LLC

Principal Place of Business

C/O CAITHNESS CORPORATION
565 FIFTH AVE 29TH FL
NEW YORK NY 10017

Registered Agent

CORPORATION SERVICE COMPANY
285 LIBERTY ST NE
SALEM OR 97301

Mailing Address

C/O CAITHNESS CORPORATION
565 FIFTH AVE 29TH FL
NEW YORK NY 10017



Phone: (503) 986-2200
Fax: (503) 378-4381

Amendment/Withdrawal - Foreign Limited Liability Company

Secretary of State
Corporation Division
255 Capitol St. NE, Suite 151
Salem, OR 97310-1327
FilingInOregon.com

Check the appropriate box below:

- ☒ AMENDMENT TO APPLICATION FOR AUTHORITY
(Complete only 1, 2, 3, 9, 10)
☐ WITHDRAWAL OF AUTHORITY TO TRANSACT BUSINESS
(Complete only 1, 4, 5, 6, 7, 8, 9, 10)

FILED

JUL 22 2009

**OREGON
SECRETARY OF STATE**

REGISTRY NUMBER: 613659-96

In accordance with Oregon Revised Statute 192.410-192.490, the information on this application is public record.
We must release this information to all parties upon request and it will be posted on our website.

For office use only

Please Type or Print Legibly in **Black Ink**. Attach Additional Sheet if Necessary.

- 1) **NAME** (Must contain the words "Limited Liability Company" or the abbreviations "LLC" or "L.L.C.")

FOURMILE CANYON WIND, LLC

AMENDMENT TO APPLICATION FOR AUTHORITY ONLY

- 2) **INITIAL REGISTRATION DATE OF APPLICATION**

7/1/2009

- 3) **AMENDMENT** (The amendment to the application for registration of foreign Limited Liability Company is as follows. Only the company name or duration can be amended. Attach a separate sheet if necessary.)

The name of the company has been

changed in its domestic state of DE.

This Amendment is to conform the OR

Application of Authority to reflect the

name change. Article 1 of the

Application for Authority is amended to

set forth the new name as follows:

1) "SADDLE BUTTE WIND, LLC"

WITHDRAWAL OF AUTHORITY ONLY

- 4) **STATE OR COUNTRY OF ORGANIZATION**

- 5) **SURRENDER OF AUTHORITY**

☐ This foreign limited liability company is not transacting business in Oregon, and surrenders its authority to transact business in Oregon.

- 6) **REVOCAION OF AGENT'S AUTHORITY**

☐ This foreign limited liability company revokes the authority of its registered agent to accept service on its behalf and appoints the Secretary of State as its agent for service of process in any proceeding based on a cause of action arising during the time it was authorized to transact business in Oregon.

- 7) **MAILING ADDRESS** (Address to which the person initiating any proceeding may mail to this corporation a copy of any process served on the Secretary of State.)

- 8) **NOTIFICATION**

☐ The foreign Limited Liability Company will notify the Corporation Division, Business Registry of any change in this mailing address for a period of five years from the date of this withdrawal.

- 9) **EXECUTION** (At least one member or manager must sign.)

Signature

David Casale

Printed Name

Saddle Butte Wind, LLC

Title

David Casale

By: Columbia Wind, LLC

Sr. V.P. of Member and

Member and Manager

Manager

- 10) **CONTACT NAME** (To resolve questions with this filing.)

Gail Conboy

DAYTIME PHONE NUMBER (Include area code.)

212-921-9099

FEES

Required Processing Fee \$50
Confirmation Copy (Optional) \$5
Processing Fees are nonrefundable.
Please make check payable to
"Corporation Division."

NOTE:

Fees may be paid with VISA or MasterCard. The card number and expiration date should be submitted on a separate sheet for your protection.



Secretary of State
Corporation Division
255 Capitol Street NE, Suite 151
Salem, OR 97310-1327

Phone:(503)986-2200
Fax:(503)378-4381
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Registry Number: 613659-96
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565 FIFTH AVE 29TH FL
NEW YORK NY 10017

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Document

APPLICATION FOR AUTHORITY

Filed On

07/01/2009

Jurisdiction

DELAWARE

Name

FOURMILE CANYON WIND, LLC

Principal Place of Business

C/O CAITHNESS CORPORATION
565 FIFTH AVE 29TH FL
NEW YORK NY 10017

Registered Agent

CORPORATION SERVICE COMPANY
285 LIBERTY ST NE
SALEM OR 97301

Mailing Address

C/O CAITHNESS CORPORATION
565 FIFTH AVE 29TH FL
NEW YORK NY 10017



Phone: (503) 986-2200
Fax: (503) 378-4381

Application for Authority to Transact—Foreign Limited Liability Company

Secretary of State
Corporation Division
255 Capitol St. NE, Suite 151
Salem, OR 97310-1327
FilingInOregon.com

FILED
JUL 01 2009
OREGON
SECRETARY OF STATE

REGISTRY NUMBER:

613659-96

For office use only

In accordance with Oregon Revised Statute 192.410-192.490, the information on this application is public record.
We must release this information to all parties upon request and it will be posted on our website.

For office use only

Please Type or Print Legibly in Black Ink. Attach Additional Sheet if Necessary.

1) **NAME** FOURMILE CANYON WIND, LLC

NOTE: (Must contain the words "Limited Liability Company" or the abbreviations "LLC" or "L.L.C.") Must be identical to the name on the Certificate of Existence. See #3.

2) **STATE OR COUNTRY OF ORGANIZATION**

DELAWARE

Date of Organization: 4/13/2008

8) **ADDRESS OF PRINCIPAL OFFICE OF THE BUSINESS**

c/o Caithness Corporation

565 Fifth Avenue, 29th floor

New York, NY 10017

3) **CERTIFICATE OF EXISTENCE**

☒ A certificate of existence, current within 60 days of delivery to this Division, authenticated by the official having custody of the organization, is attached.

4) **DURATION** (Please check one.)

☐ Latest date upon which the Limited Liability Company is to
dissolve is _____

☒ Duration shall be perpetual.

9) **ADDRESS WHERE THE DIVISION MAY MAIL NOTICES**

c/o Caithness Corporation

565 Fifth Avenue, 29th floor

New York, NY 10017

5) **THIS FOREIGN LIMITED LIABILITY COMPANY SATISFIES THE REQUIREMENTS OF ORS 63.714(3).**

6) **NAME OF OREGON REGISTERED AGENT**

Corporation Service Company

7) **REGISTERED AGENT'S PUBLICLY AVAILABLE ADDRESS** (Must be an Oregon Street Address, which is identical to the registered agent's business office.)

285 Liberty Street NE

Salem, OR 97301

10) **IF THIS LIMITED LIABILITY COMPANY IS NOT MEMBER MANAGED, CHECK ONE BOX BELOW.**

☐ This limited liability company is managed by a single manager.

☐ This limited liability company is managed by multiple manager(s).

11) **EXECUTION** (At least one member or manager must sign.)

Signature
Barbara Bishop Gollan
Barbara Bishop Gollan

Printed Name
Fourmile Canyon Wind, LLC
By: Columbia Wind, LLC
Member and Manager

Title
Barbara Bishop Gollan
Executive Vice President of Member and
Manager

12) **CONTACT NAME** (To resolve questions with this filing.)

Gail Conboy

DAYTIME PHONE NUMBER (Include area code.)

212-921-9099

FEES

Required Processing Fee \$50
Confirmation Copy (Optional) \$5

Processing Fees are nonrefundable.
Please make check payable to "Corporation Division."

NOTE:

Fees may be paid with VISA or MasterCard. The card number and expiration date should be submitted on a separate sheet for your protection.

Delaware

The First State

PAGE **FILED**
JUL 01 2009
OREGON
SECRETARY OF STATE

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "FOURMILE CANYON WIND, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-FIFTH DAY OF JUNE, A.D. 2009.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "FOURMILE CANYON WIND, LLC" WAS FORMED ON THE THIRTIETH DAY OF APRIL, A.D. 2008.


AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN PAID TO DATE.

4541343 8300

090649276

You may verify this certificate online
at corp.delaware.gov/authver.shtml




Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 7384383

DATE: 06-25-09

Attachment 2. Tax Lots and Property Owner Information

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Notice of Intent to Apply for a Site Certificate for the Saddle Butte Energy Facility -
Property Owner List Received from Gilliam County 11/24/2025

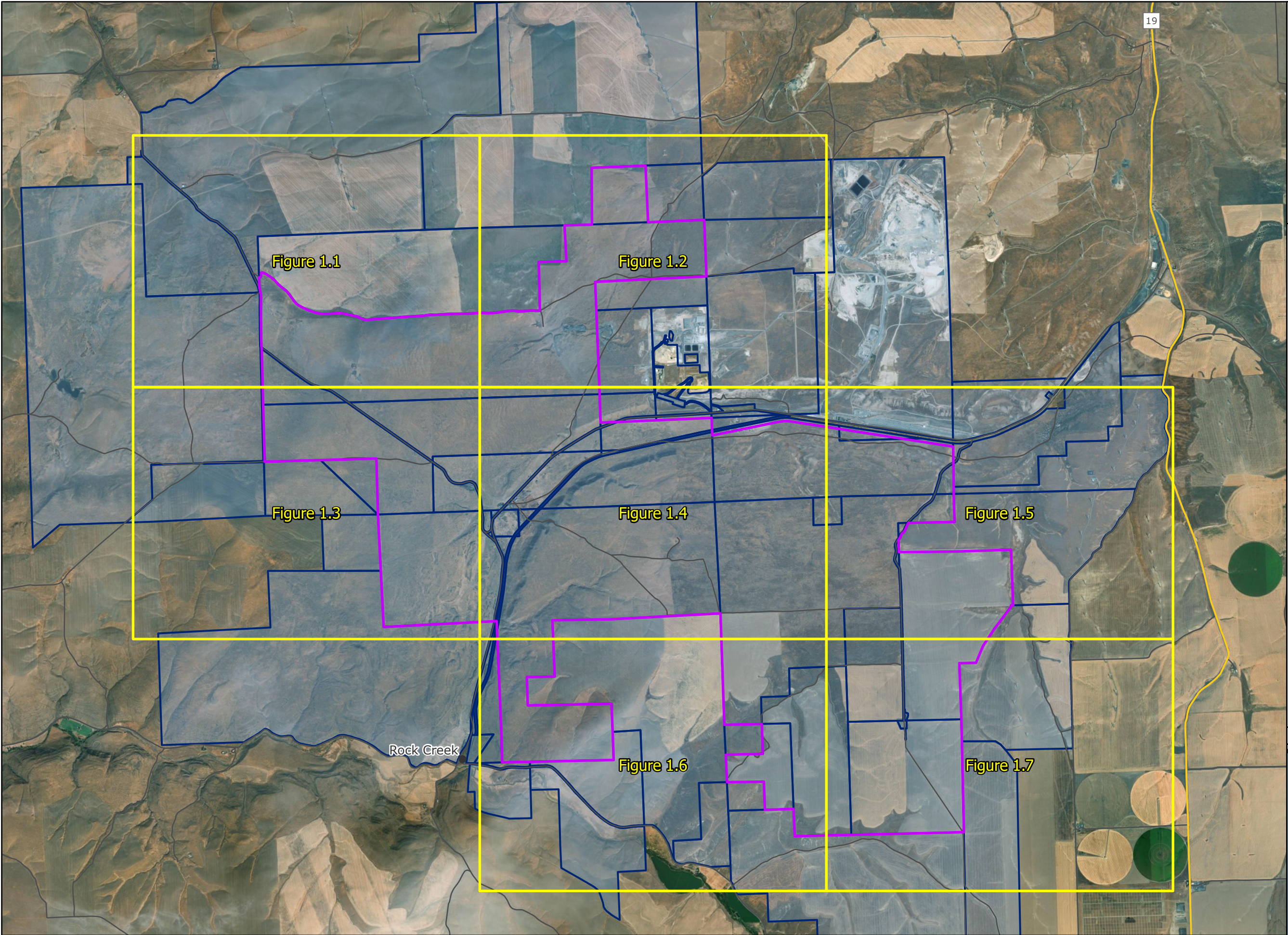
Taxlot ID	OWNERSHIP	ADDRESS	CITY	STATE	ZIP
01N20E0000-00100	HOLZAPFEL LAND & CATTLE LP	PO BOX 1027	WILLOWS	CA	95988
01N20E0000-00200	HOLZAPFEL LAND & CATTLE LP	PO BOX 1027	WILLOWS	CA	95988
01N20E0000-00300	ANDERSON CHARLES & MARCIA A TRUSTEES	69530 CONDON HWY	HEPPNER	OR	97836
01N20E0000-00500	4-D RANCH LLC	6808 SE ASH ST	PORTLAND	OR	97215
01N20E0000-00800	RAMSAY RANCH & CO LLC	43901 RUNNING IRON RD	BAKER CITY	OR	97814
01N20E0000-00900	RAMSAY RANCH & CO LLC	43901 RUNNING IRON RD	BAKER CITY	OR	97814
01N20E0000-01000	MARICK JASON T & BEVERLY K	14394 MIDDLE ROCK CREEK LN.	ARLINGTON	OR	97812
01N20E0000-01100	RAMSAY RANCH & CO LLC	43901 RUNNING IRON RD	BAKER CITY	OR	97814
01N20E0000-03200	UNION PACIFIC RAILROAD	1400 DOUGLAS STOP 1640	OMAHA	NE	68179
01N20E0000-03201	GABBAY JERRY	PO BOX 433	ARLINGTON	OR	97812
01N20E0000-03204	HOLZAPFEL LAND & CATTLE LP	PO BOX 1027	WILLOWS	CA	95988
01N20E0000-03205	HOLZAPFEL LAND & CATTLE LP	PO BOX 1027	WILLOWS	CA	95988
01N20E0000-03208	UNION PACIFIC RAILROAD	1400 DOUGLAS STOP 1640	OMAHA	NE	68179
01N21E0000-00300	HOLTZ TIMOTHY H & DEBORAH L	PO BOX 224	IONE	OR	97843
01N21E0000-00400	HARPER RICHARD E	PO BOX 8	IONE	OR	97843
01N21E0000-00401	RUNCKEL LLC	24801 SW LADD HILL RD	SHERWOOD	OR	97140
01N21E0000-00500	HOLZAPFEL LAND & CATTLE LP	PO BOX 1027	WILLOWS	CA	95988
01N21E0000-00600	USA*	3050 NE 3RD ST	PRINEVILLE	OR	97754
01N21E0000-00700	RUNCKEL LLC	24801 SW LADD HILL RD	SHERWOOD	OR	97140
01N21E0000-00800	SUTTON ROBERT K	7707 WISCONSIN AVE #1102	BETHESDA	MD	20814
01N21E0000-00804	HOLTZ TIMOTHY H & DEBORAH L	PO BOX 224	IONE	OR	97843
01N21E0000-01100	RUCKER JIMMY I & SARAH D TRUSTEES	69064 WEATHERFORD RD	ARLINGTON	OR	97812
01N21E0000-01101	RUNCKEL LLC	24801 SW LADD HILL RD	SHERWOOD	OR	97140
01N21E0000-01200	RUCKER JIMMY I & SARAH D TRUSTEES	69064 WEATHERFORD RD	ARLINGTON	OR	97812
01N21E0000-01300	RAMSAY RANCH & CO LLC	43901 RUNNING IRON RD	BAKER CITY	OR	97814
01N21E0000-01400	MARICK JASON T & BEVERLY K	14394 MIDDLE ROCK CREEK LN.	ARLINGTON	OR	97812
01N21E0000-01500	WEEDMAN BROTHERS	PO BOX 386	WASCO	OR	97065
02N20E0000-01500	OREGON WASTE SYSTEMS INC	PO BOX 1450	CHICAGO	IL	60690
02N20E0000-01501	HOLZAPFEL HERBERT R ETAL	PO BOX 1027	WILLOWS	CA	95988
02N20E0000-01602	ANDERSON STEVEN	14100 HERITAGE LN	ARLINGTON	OR	97812
02N20E0000-02000	JOHN DAY RIVER CLUB LLC	1430 S MARY FAILING DR	PORTLAND	OR	97219
02N20E0000-02300	OREGON WASTE SYSTEMS INC	PO BOX 1450	CHICAGO	IL	60690
02N20E0000-02301	CWM OF THE NORTHWEST INC	PO BOX 1450	CHICAGO	IL	60690
02N20E0000-02302	CWM OF THE NORTHWEST INC	PO BOX 1450	CHICAGO	IL	60690
02N20E0000-02313	CWM OF THE NORTHWEST INC	PO BOX 1450	CHICAGO	IL	60690
02N20E0000-02317	CWM OF THE NORTHWEST INC	PO BOX 1450	CHICAGO	IL	60690
02N20E0000-02318	HOLZAPFEL HERBERT R ETAL	PO BOX 1027	WILLOWS	CA	95988
02N20E0000-02500	USA	3050 NE 3RD ST	PRINEVILLE	OR	97754
02N20E0000-02600	MORRIS LLC FRANCES L	81379 CRAIG RD	HERMISTON	OR	97838
02N20E0000-02700	HOLZAPFEL HERBERT R ETAL	PO BOX 1027	WILLOWS	CA	95988
02N20E0000-02701	ANDERSON CHARLES & MARCIA A TRUSTEES	69530 CONDON HWY	HEPPNER	OR	97836
02N20E0000-02702	ANDERSON CHARLES & MARCIA A TRUSTEES	69530 CONDON HWY	HEPPNER	OR	97836

Notice of Intent to Apply for a Site Certificate for the Saddle Butte Energy Facility -
Property Owner List Received from Gilliam County 11/24/2025

Taxlot ID	OWNERSHIP	ADDRESS	CITY	STATE	ZIP
02N20E0000-02703	CWM OF THE NORTHWEST INC	PO BOX 1450	CHICAGO	IL	60690
02N20E0000-02800	HOLZAPFEL LAND & CATTLE LP	PO BOX 1027	WILLOWS	CA	95988
02N20E0000-02900	UNION PACIFIC RAILROAD	1400 DOUGLAS STOP 1640	OMAHA	NE	68179
02N20E0000-02901	HOLZAPFEL LAND & CATTLE LP	PO BOX 1027	WILLOWS	CA	95988
02N21E0000-01101	WASTE MANAGEMENT DISPOSAL SERVICES OF OR	800 CAPITOL ST STE 3000	HOUSTON	TX	77002
02N21E0000-01200	HOLZAPFEL LAND & CATTLE LP	PO BOX 1027	WILLOWS	CA	95988
02N21E0000-01201	WASTE MANAGEMENT DISPOSAL SERVICES OF OR	PO BOX 1450	CHICAGO	IL	60690
02N21E0000-01203	OREGON WASTE SYSTEMS INC	PO BOX 1450	CHICAGO	IL	60690
02N21E0000-01204	OREGON WASTE SYSTEMS INC	PO BOX 1450	CHICAGO	IL	60690
02N21E0000-01205	CWM OF THE NORTHWEST INC	PO BOX 1450	CHICAGO	IL	60690
02N21E0000-01209	WASTE MANAGEMENT	PO BOX 1450	CHICAGO	IL	60690
02N21E0000-01210	WASTE MANAGEMENT	PO BOX 1450	CHICAGO	IL	60690
02N21E0000-01701	HOLZAPFEL HERBERT R & VIRGINIA W	PO BOX 1027	WILLOWS	CA	95988
02N21E0000-01704	HOLTZ TIMOTHY H & DEBORAH L	PO BOX 224	IONE	OR	97843
02N21E0000-01800	OREGON WASTE SYSTEMS INC	PO BOX 1450	CHICAGO	IL	60690
02N21E0000-02100	HOLZAPFEL LAND & CATTLE LP	PO BOX 1027	WILLOWS	CA	95988
02N21E0000-02102	WASTE MANAGEMENT	PO BOX 1450	CHICAGO	IL	60690
02N21E0000-02103	WASTE MANAGEMENT	PO BOX 1450	CHICAGO	IL	60690
02N21E0000-02600	UNION PACIFIC RAILROAD	1400 DOUGLAS STOP 1640	OMAHA	NE	68179

*The Applicant reviewed available data to determine that this taxlot with "USA" in the Owner field and no address or other identifying information is property managed by the Bureau of Land Management (BLM) Prineville District. The address for the BLM Prineville District Office is provided.

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Saddle Butte Energy Facility

Figure 1 Taxlots

GILLIAM COUNTY, OR

- Map Grid
- Project Boundary
- Gilliam County Taxlot Boundary*
- City/Town
- State Highway
- Local Roads

*Data obtained from Gilliam County on 11/24/2025



Reference Map



1:51,898

WGS 1984 UTM Zone 10N

0 1 2 4 Miles

NOT FOR CONSTRUCTION




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Saddle Butte Energy Facility

Figure 1.1
Taxlots

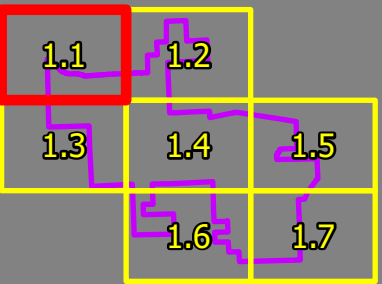
GILLIAM COUNTY, OR

-  Project Boundary
-  Gilliam County Taxlot Boundary*
-  Local Roads

*Data obtained from Gilliam County on 11/24/2025



Reference Map



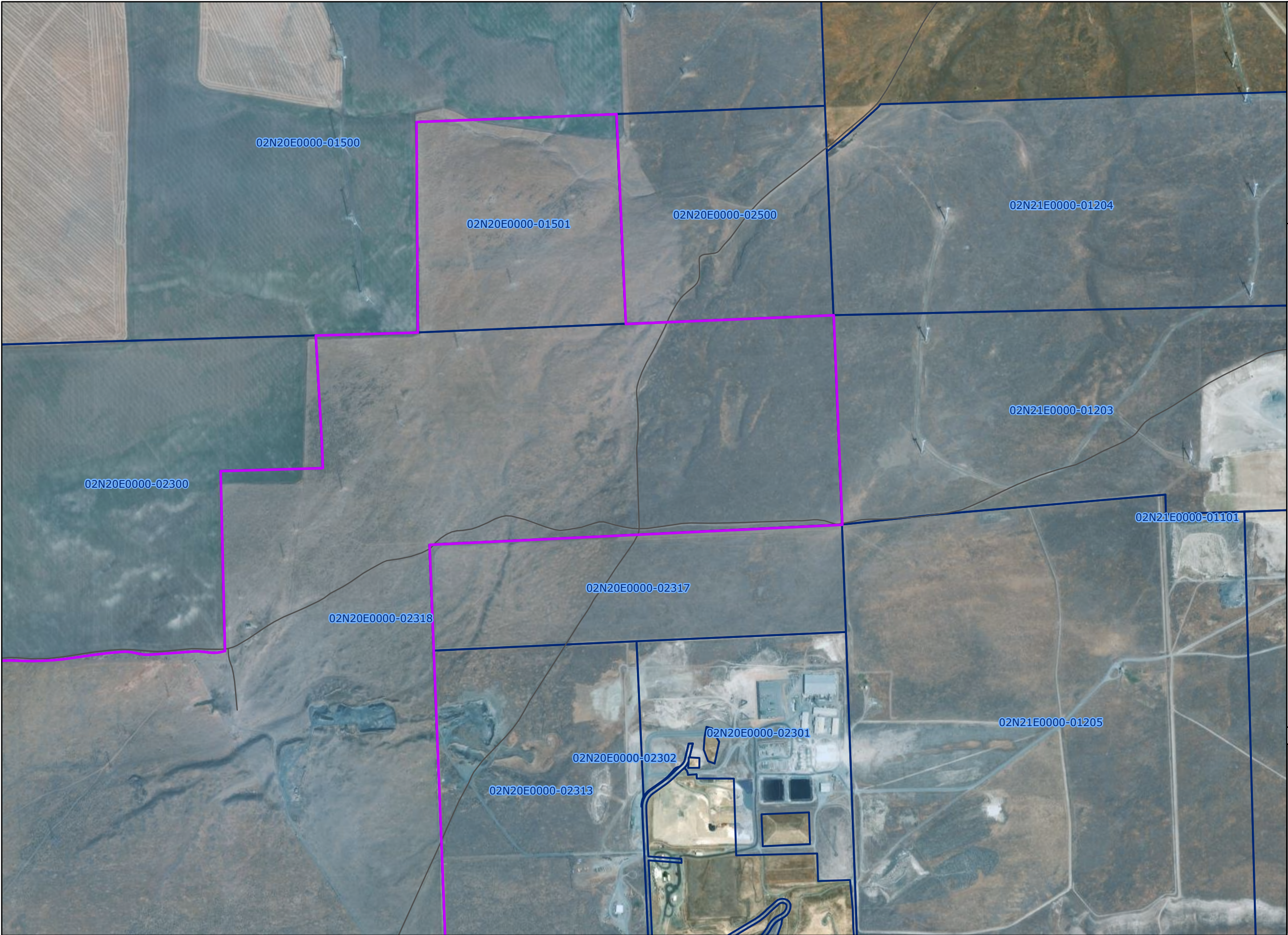
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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION




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Saddle Butte Energy Facility

Figure 1.2
Taxlots

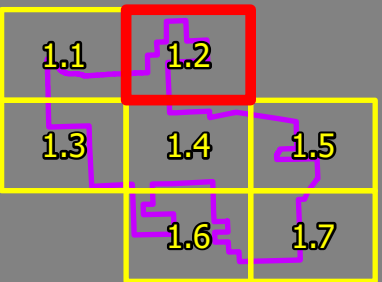
GILLIAM COUNTY, OR

-  Project Boundary
-  Gilliam County Taxlot Boundary*
-  Local Roads

*Data obtained from Gilliam County on 11/24/2025



Reference Map



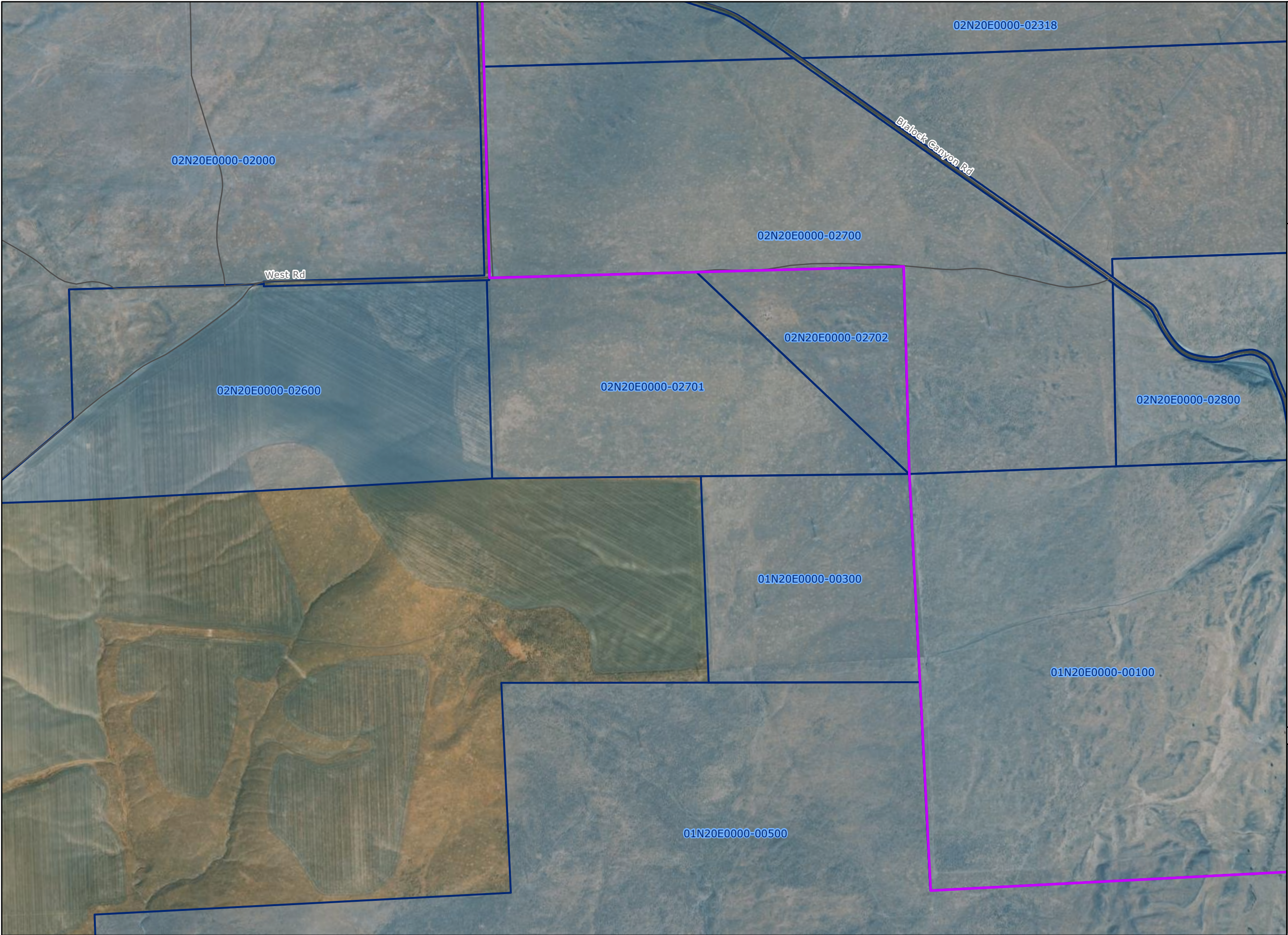
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WGS 1984 UTM Zone 10N



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Saddle Butte Energy Facility

Figure 1.3
Taxlots

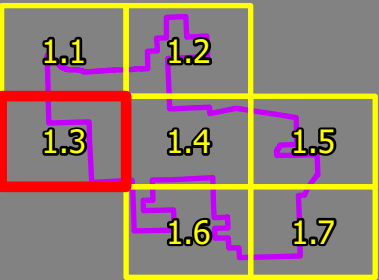
GILLIAM COUNTY, OR

-  Project Boundary
-  Gilliam County Taxlot Boundary*
-  Local Roads

*Data obtained from Gilliam County on 11/24/2025



Reference Map

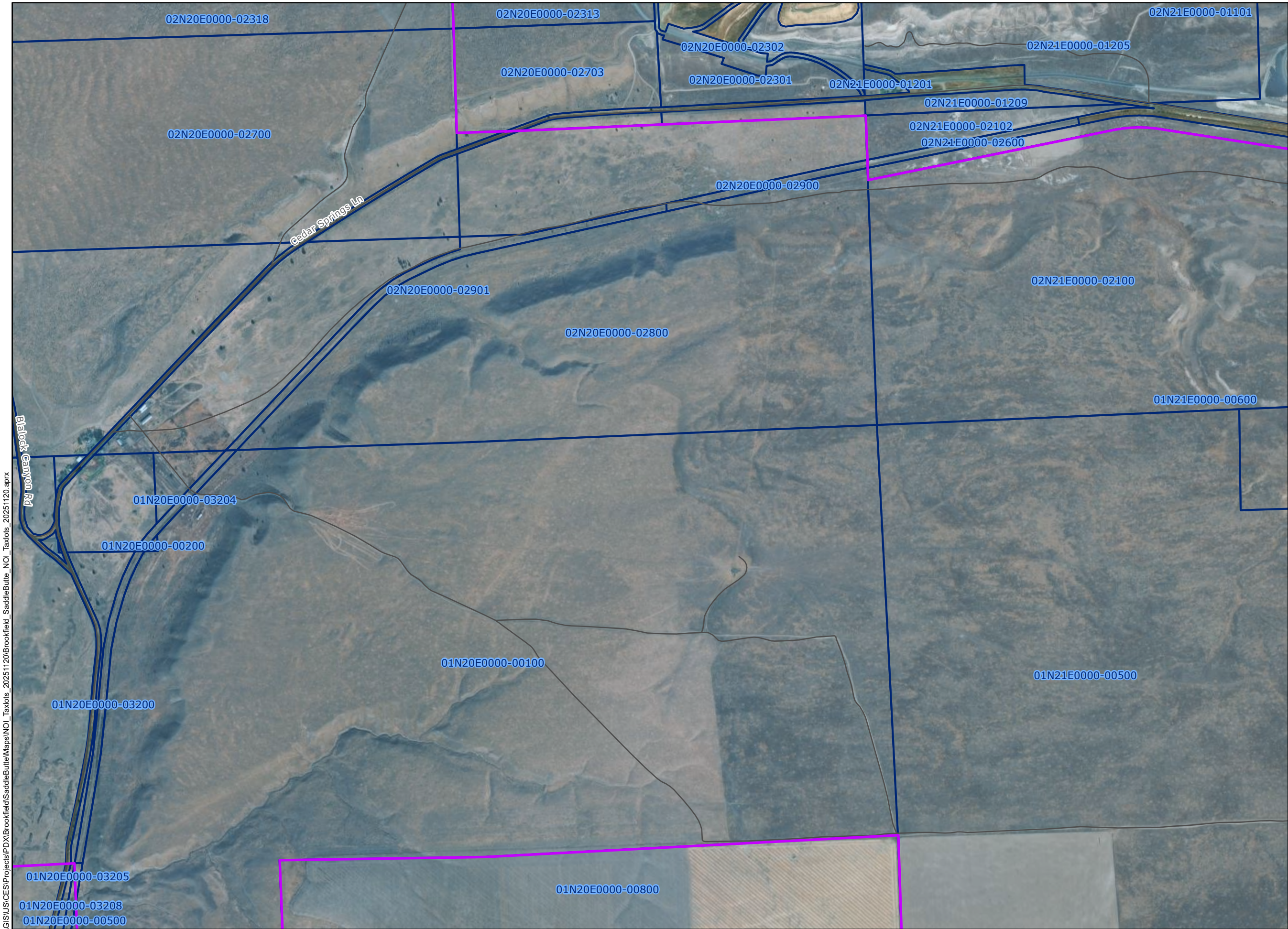


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WGS 1984 UTM Zone 10N






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Saddle Butte Energy Facility

Figure 1.4
Taxlots

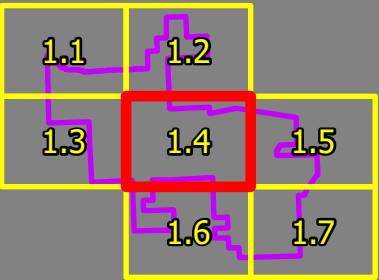
GILLIAM COUNTY, OR

-  Project Boundary
-  Gilliam County Taxlot Boundary*
-  Local Roads

*Data obtained from Gilliam County on 11/24/2025



Reference Map



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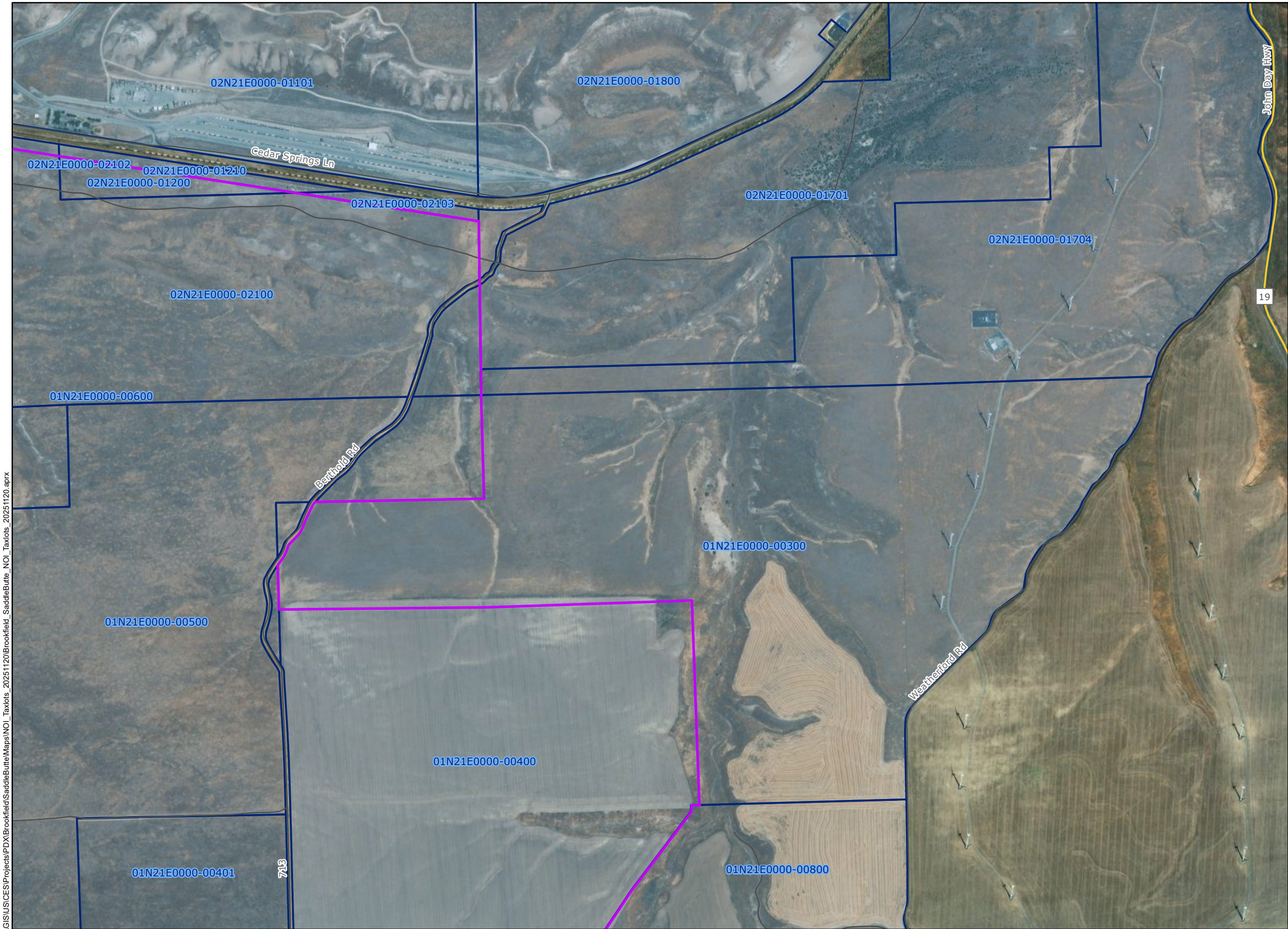


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WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION



Saddle Butte Energy Facility

Figure 1.5
Taxlots

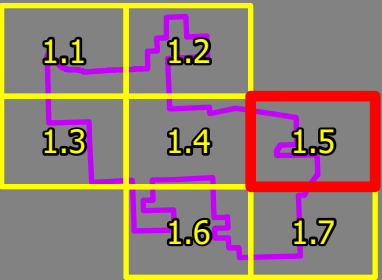
GILLIAM COUNTY, OR

- Project Boundary
- Gilliam County Taxlot Boundary*
- State Highway
- Local Roads

*Data obtained from Gilliam County on 11/24/2025



Reference Map

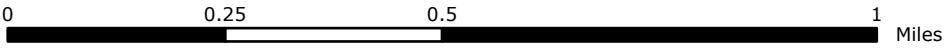


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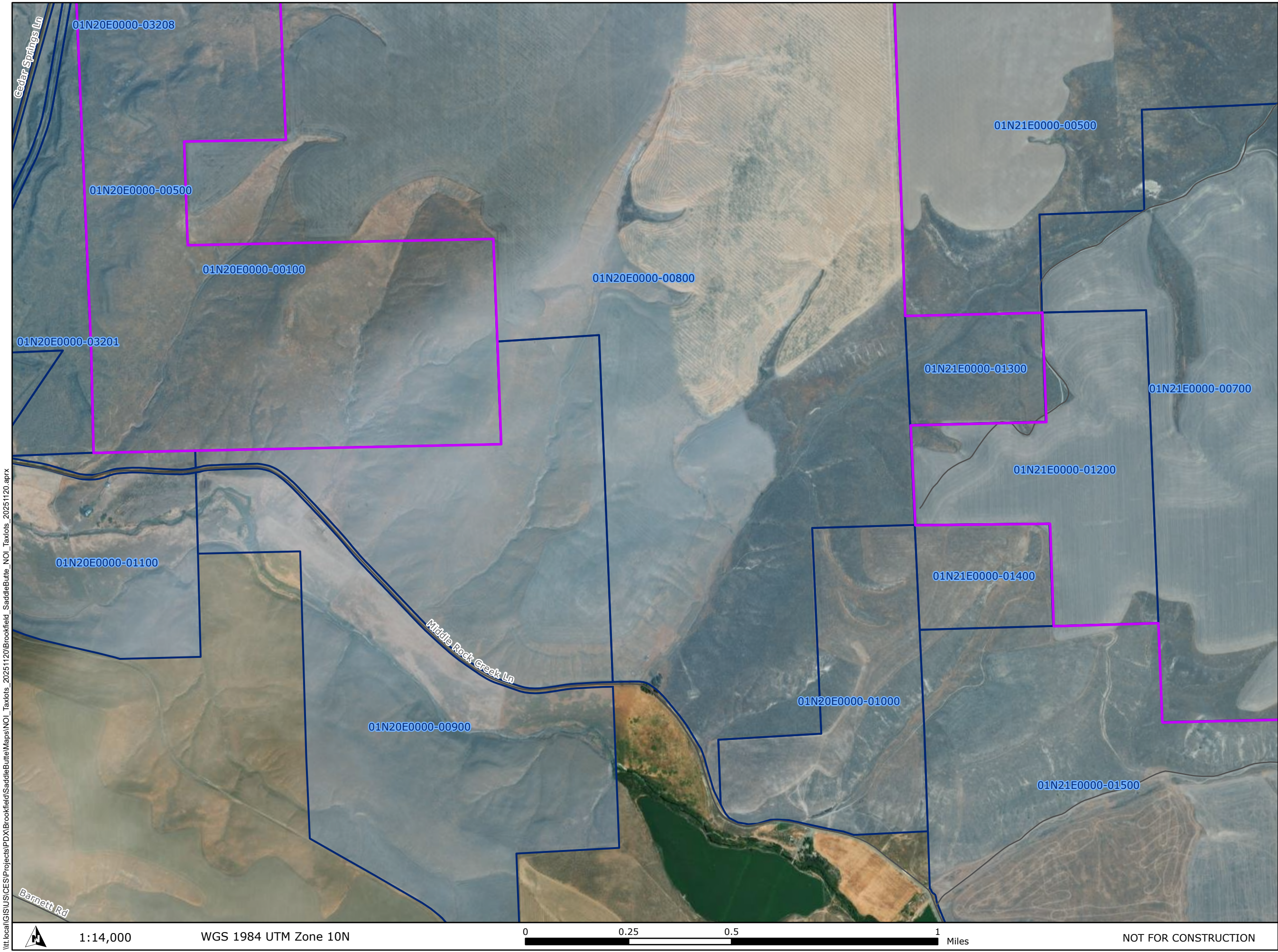


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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION



Saddle Butte Energy Facility

Figure 1.6
Taxlots

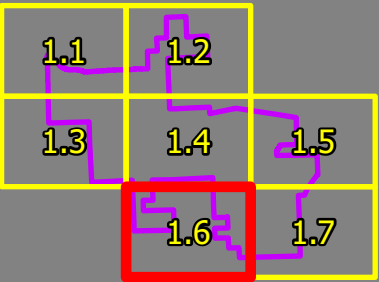
GILLIAM COUNTY, OR

- Project Boundary
- Gilliam County Taxlot Boundary*
- Local Roads

*Data obtained from Gilliam County on 11/24/2025



Reference Map



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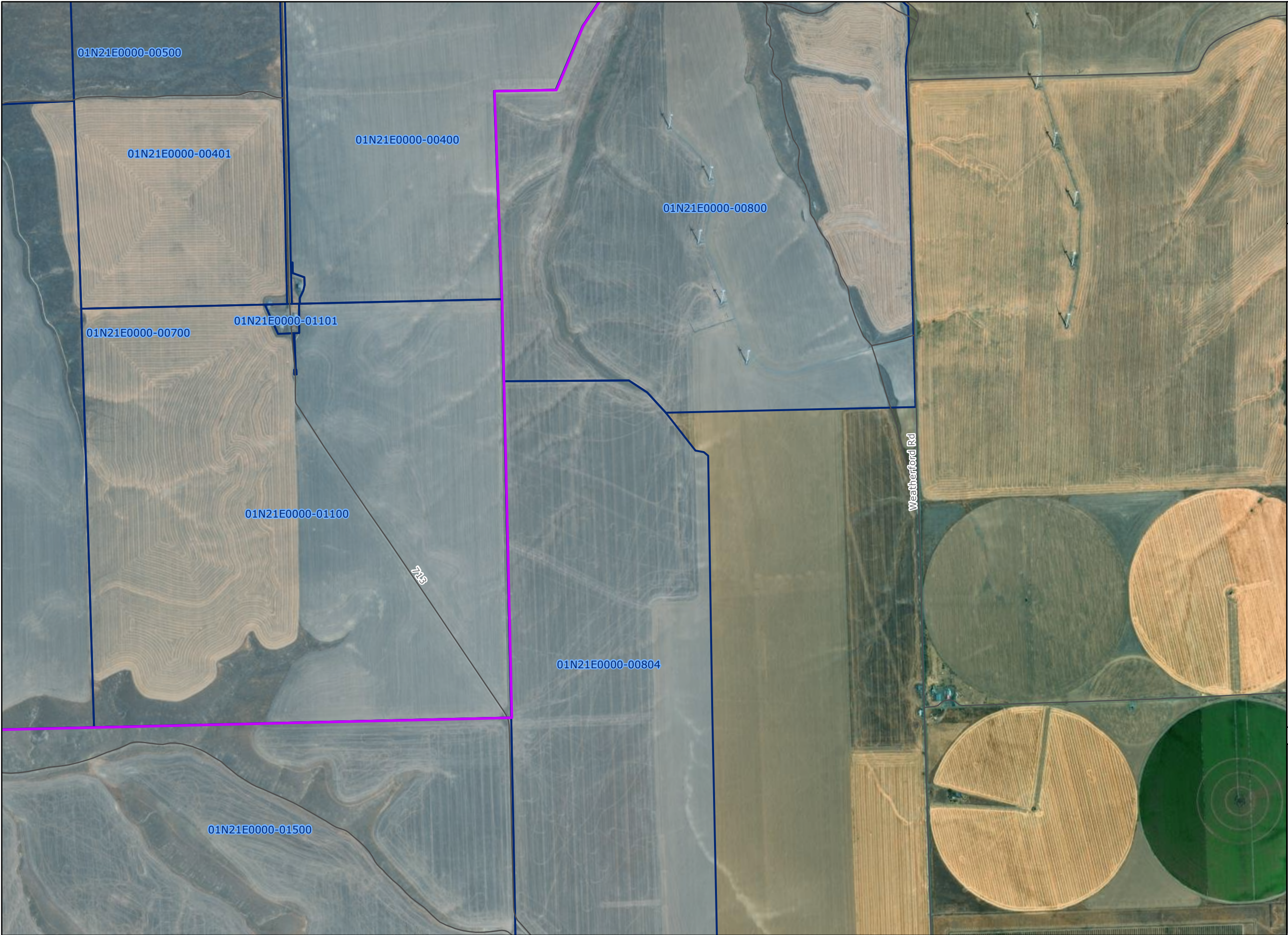
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WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION




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Saddle Butte Energy Facility

**Figure 1.7
Taxlots**

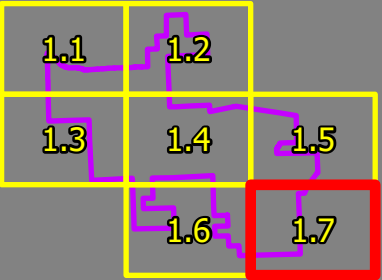
GILLIAM COUNTY, OR

-  Project Boundary
-  Gilliam County Taxlot Boundary*
-  Local Roads

*Data obtained from Gilliam County
on 11/24/2025

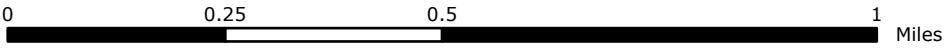


Reference Map



1:14,000

WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

Attachment 3. Correspondence with Legislative Commission on Indian Services

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RE: Request for Tribal Contact List - Brookfield Saddle Butte Wind project

From LCIS <LCIS@oregonlegislature.gov>

Date Tue 6/10/2025 2:24 PM

To Nelson, Matt <MATT.NELSON@tetrattech.com>

Cc Jain, Aaftab <AAFTAB.JAIN@tetrattech.com>; King, Erin <Erin.King@tetrattech.com>

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



Good afternoon Matt,

Thank you for reaching out to our office. For this work area in Gilliam Co., I recommend contacting the following Tribes:

Burns Paiute Tribe

Confederated Tribes of the Umatilla Indian Reservation

Confederated Tribes of Warm Springs Reservation of Oregon

Contact information for culture and heritage Tribal staff can be found on our website: [Commission on Indian Services archaeology \(oregonlegislature.gov\)](https://www.oregonlegislature.gov/Commission-on-Indian-Services/archaeology/).

Please let me know if you have any additional questions.

Cheers,
Elissa

Dr. Elissa Bullion, PhD (she/her/hers)
State Physical Anthropologist
Legislative Commission on Indian Services
Oregon State Capitol Building
900 Court Street, NE, Room 167
Salem, Oregon 97301
Phone: 971-707-1372
LCIS Office: 503-986-1067
Elissa.Bullion@oregonlegislature.gov



From: Nelson, Matt <MATT.NELSON@tetrattech.com>
Sent: Tuesday, June 10, 2025 12:02 PM
To: LCIS <LCIS@oregonlegislature.gov>

Cc: Jain, Aaftab <AAFTAB.JAIN@tetrattech.com>; King, Erin <Erin.King@tetrattech.com>

Subject: Request for Tribal Contact List - Brookfield Saddle Butte Wind project

CAUTION: This email originated from outside the Legislature. Use caution clicking any links or attachments.

You don't often get email from matt.nelson@tetrattech.com. [Learn why this is important](#)

Good Afternoon,

This email is to request from LCIS a list of tribes to contact regarding the proposed Saddle Butte Wind Project in Gilliam County, Oregon. The project is in the planning phases ahead of field surveys and is anticipated to require a Site Certificate from the Oregon Energy Facility Siting Council. The proposed area of the project is located on private lands south of Arlington, Oregon in the legal locations listed below. A location map is attached.

- Township 2 North/Range 21 East: Sections 31 and 32
- Township 2 North/Range 20 East: Sections 23-24, 26-28, and 33-36
- Township 1 North/Range 20 East: Sections 1-3, 11, and 14
- Township 1 North/Range 21 East: Sections 4-9, and 17-18

Thank you for your time.

Matt Nelson

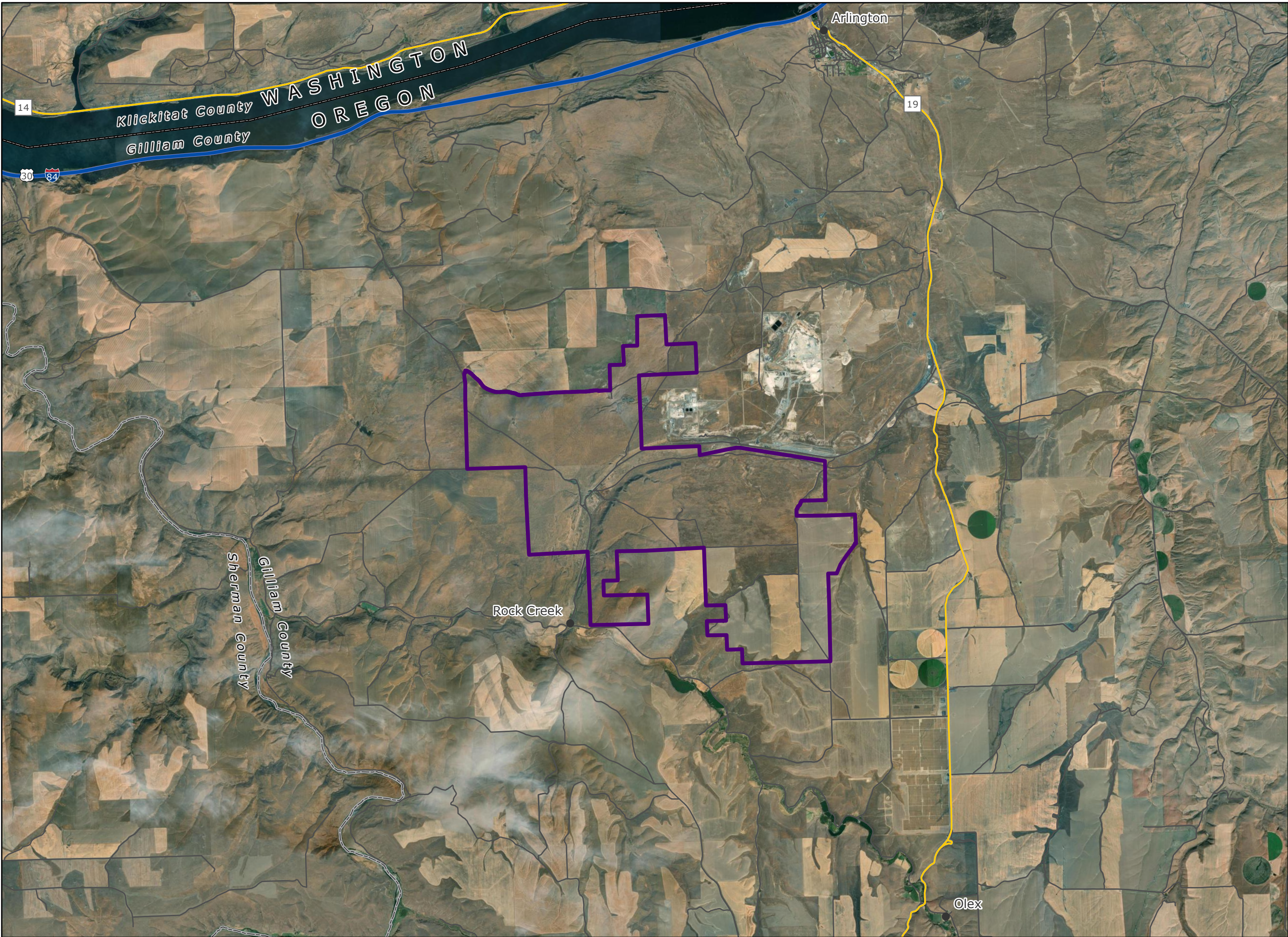
Matthew Nelson, MA, RPA | Senior Archaeologist/Principal Investigator | Tetra Tech

Direct +1 (208) 489-2826 | Mobile +1 (208) 993-4219 | matt.nelson@tetrattech.com

Time Zone: Mountain Standard

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Saddle Butte

**Figure 1
Project Location**

GILLIAM COUNTY, OR

- Project Boundary
- State Boundary
- County Boundary
- City/Town
- Interstate Highway
- US Highway
- State Highway
- Local Roads

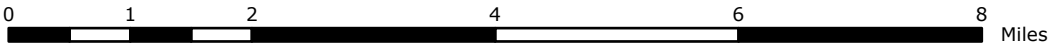


Reference Map



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WGS 1984 UTM Zone 10N



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