Notice of Intent to Apply for a Site Certificate

Well Springs Solar Project
December 2025

Submitted to
Oregon Energy Facility Siting Council

Prepared for
Well Springs Solar LLC

Prepared by

TETRA TECH

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Acronyms and Abbreviations

AC	alternating current
ACDP	Air Contaminant Discharge Permit
Applicant	Well Springs Solar LLC
ASC	Application for Site Certificate
BESS	battery energy storage system
CFR	Code of Federal Regulations
DC	direct current
EFSC	Oregon Energy Facility Siting Council
EFU	Exclusive Farm Use zoning district
FAA	Federal Aviation Administration
Facility	Well Springs Solar Project
gen-tie	generation tie
kV	kilovolt
MW	megawatt
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
PGE	Portland General Electric
POI	point of interconnection
RFPD	Rural Fire Protection District
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:

Well Springs Solar LLC

c/o MN8 Energy Development Company LLC

1155 Avenue of the Americas, 27th Floor

New York, NY 10036

(332) 245-4052

inquiries@mn8energy.com

Applicant contact person for the Notice of Intent (NOI):

Sarah Polachek

Permitting Manager

Well Springs Solar LLC

c/o MN8 Energy Development Company LLC

1155 Avenue of the Americas, 27th Floor

New York, NY 10036

(561) 803-0681

sarah.polachek@mn8.com

Tim Seck

Authorized Representative

Well Springs Solar LLC

c/o MN8 Energy Development Company LLC

1155 Avenue of the Americas, 27th Floor

New York, NY 10036

(561) 440-2322

tim.seck@mn8.com

(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:

MN8 Energy Development Company LLC

1155 Avenue of the Americas, 27th Floor

New York, NY 11036

(332) 245-4052

inquiries@mn8energy.com

Contact persons other than the Applicant:

Matt Hutchinson

Senior Development Manager

Well Springs Solar LLC

c/o MN8 Energy Development Company LLC

2500 NE Sandy Blvd, Suite J

Portland, OR 97232

(503) 318-1629

matthew.hutchinson@mn8.com

Carrie Konkol

Tetra Tech, Inc.

1750 S Harbor Way, Suite 400

Portland, OR 97201

(503) 721-7225

carrie.konkol@tetratech.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 is a subsidiary of their parent company:

MN8 Energy Development Company LLC

1155 Avenue of the Americas, 27th Floor

New York, NY 11036

(332) 245-4052

inquiries@mn8energy.com

(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 primary contact submitting this NOI is:

Sarah Polachek

Permitting Manager

Well Springs Solar LLC

c/o MN8 Energy Development Company LLC

1155 Avenue of the Americas, 27th Floor

New York, NY 10036

(561) 803-0681

sarah.polachek@mn8.com

The officer responsible for the submission by Well Springs Solar LLC is:

Tim Seck

Authorized Representative

Well Springs Solar LLC

c/o MN8 Energy Development Company LLC

1155 Avenue of the Americas, 27th Floor

New York, NY 10036

(561) 440-2322

tim.seck@mn8.com

Well Springs Solar LLC was formed with the Secretary of State of the State of Delaware on August 4, 2025, and was acknowledged and registered to do business in Oregon by the Oregon Secretary of State on August 6, 2025, in Salem, Oregon. The articles of organization and registration to do business in Oregon are provided in Attachment 1.

Well Springs Solar LLC is registered in Oregon; therefore, information for the resident attorney-in-fact is not required.

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 Well Springs Solar Project (Facility), a photovoltaic solar energy generation facility and battery energy storage system (BESS), located in unincorporated Morrow County, Oregon (Figure 1). As described further below, the Facility is anticipated to consist of up to 750 megawatts (MW) of solar generation and 500 MW of BESS. The Facility's site boundary will encompass 7,365 acres of privately owned land northwest of Ione, Oregon, as well as one of five proposed generation-tie (gen-tie) corridors (see description below; Figure 1). The Facility may be constructed in phases depending on interconnection agreements, customer offtake agreements, and market conditions: Two phases are anticipated at this time (500 MW solar/250 MW BESS and 250 MW solar/250 MW BESS, respectively), but the Facility could be constructed in any configuration or phasing up to 750 MW solar/500 MW BESS. The phases will have shared facilities including the gen-tie transmission line, access roads, operations and maintenance (O&M) building(s), and other related and supporting facilities. The Applicant has proposed to interconnect the Facility via a 230-kilovolt (kV) gen-tie transmission line to PacifiCorp's Apex 230/500-kV substation (gen-tie options described below), which is currently under construction but anticipated to be operational prior to the start of Facility construction. The Facility may also interconnect to the existing Portland General Electric (PGE) Grassland 500-kV Switchyard as a secondary point of interconnection (POI).

The Applicant is in the process of conducting studies that will be included in the Application for Site Certificate (ASC) to Oregon's Energy Facility Siting Council (EFSC).

(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 is anticipated to have up to 750 MWac of nominal and average generating capacity at the POI, 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 will generate electricity using photovoltaic solar panels wired in series and in parallel to form arrays. Each solar array will be composed of a combination of solar modules, tracker systems, posts, and related electrical equipment. Solar technology is rapidly evolving and the solar modules and associated equipment, and the precise layout of the solar arrays and related or supporting facilities, have not yet been determined. During preconstruction and final design, 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 flexibility to permit a range of solar array technology to accommodate market changes and to preserve layout as well as design flexibility.

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

- **Solar Modules.** Solar modules utilize solar cells to generate electricity by converting sunlight energy into direct current (DC) electrical energy. The electrical generation from a single solar module will vary by module size and the number of cells per module. As technology continues to evolve, final module specifications are usually in flux until late in the development process. The type and manufacturer of solar modules to be installed at the Facility will be selected prior to construction based on module availability, current technology, and final design of the Facility. Solar modules will be selected from Tier 1 manufacturers and shall be monocrystalline, poly-crystalline, or thin-film solar module type. The representative modules used in current preliminary site design each have a nameplate rating of 560 watts and measure 7.5 feet by 4 feet. Solar modules consist of solar cells, antireflective glass, a metal frame, and factory-installed "quick connect" wire connectors. The modules will be connected in series to form long rows. The rows of modules are then connected via combiners or connector cables. The configuration of multiple rows (the array) can vary depending on the equipment type and topography. A total of 1,623,156 modules is anticipated (1,077,984 and 545,172 modules for the two anticipated construction phases, respectively); however, the actual number of modules will depend on the module technology, spacing, mounting equipment, and other design criteria that will be determined during final design.
- **Tracker Systems.** Strings of solar modules will be mounted on ground fixed-tilt or single-axis tracker systems that optimize electricity production by rotating the solar modules to follow the path of the sun throughout the day. The tracking systems and racking can hold the solar modules in either portrait or landscape orientation with modules being single or double stacked. The length of each tracker string may vary by topography and the number of modules that the tracker can hold. The distance between each row will depend on the tracker technology, topography, solar modules size, and other site constraints; a distance of 17.6 feet is assumed between tracker rows to ensure that adjacent rows do not shade each other during all parts of the day, and 20 feet would be maintained from the tracker to the surrounding fence line. The drive unit for the single-axis tracking system can control a single string or multiple strings of modules through a series of mechanical linkages and

gearboxes. As the solar modules tilt throughout the day, the height of their top edges will shift accordingly. An example tracking system would rotate up to 60 degrees to the east and west to maximize sun exposure to the modules. The maximum height of the module would be approximately 15 feet when fully rotated. The system height could vary where it spans dips in topography, or if dual use/agrivoltaics are utilized. The actual tracker system will be selected based on geotechnical considerations, market availability, and final design considerations prior to construction and will be specifically designed to withstand wind, snow, and seismic loads anticipated at the site.

- **Posts.** Each tracker will be supported by multiple driven steel posts, which could be round hollow posts, or pile-type posts (i.e., H-pile, C-pile, S-pile). Post depth may vary depending on soil conditions. Posts typically protrude approximately 5 feet above ground and would be driven to an adequate depth that will be determined by a geotechnical study. Posts at the end of tracker strings are usually installed to greater depth to withstand wind uplift. In some soil conditions, concrete backfill may be required for each post. Typical embedment depth of up to 10 feet is anticipated for each post, depending on geotechnical foundation requirements. Nineteen posts are assumed for each tracker row (which would hold up to 108 modules); however, post locations will be determined by the final layout of the tracker system and geotechnical investigations of the solar array area within the Facility site boundary prior to final design.
- **Inverters, Transformers, and Switchgear.** DC collected from the solar modules will be converted into alternating current (AC) before connecting to a collector substation. Low-voltage cabling will link each solar module to the inverters and transformers. Inverters serve the function of converting DC power supply to an AC power supply in accordance with electrical requirements. The AC from the inverters is routed to transformers that will increase the output voltage from the inverter to the collector substations' feed voltage of 34.5 kV. The transformers could be collocated with the inverters and centrally located within the Facility site boundary or dispersed throughout the solar array, all of which would be mounted on concrete pads. Electricity would be conveyed from the transformers to the switchgear by 34.5-kV underground collector lines. A total of 197 inverter/transformer stations is anticipated (131 and 66 stations for the two anticipated construction phases, respectively); however, the number of inverters and transformers will vary depending on the final solar array layout. The inverter and transformer specifications will comply with applicable requirements of the National Electrical Safety Code and Institute of Electrical and Electronics Engineers standards.
- **Cabling.** Solar modules generate DC electricity. Cables collect and aggregate the DC before it is converted to AC and sent to a collector substation. Low-voltage cabling will connect the solar modules of each tracker string in a series and combine multiple strings to a single combiner box. Cabling from multiple combiner boxes will connect to a single inverter, which will convert the DC to AC and connect to the buried collection system. Cabling can be mounted to the tracker system, placed in cable trays, or buried.

- **Collection System.** The inverters and transformers will connect the generation output of the solar array to 34.5-kV collector lines which may be underground. If they are underground, AC electrical cables will be buried to a minimum of 3 feet. If they are overhead, the collector lines will be supported by wooden or steel pole structures. Specific locations and dimensions of overhead collector lines, if necessary, will not be known until site geotechnical work is completed during pre-construction activities and prior to final design. Collector line may alternatively be hung on racking systems; some racking systems allow for installation of above-ground cabling that is hung on specialized hangers (such as Cab Solar hangers) or placed in cable trays.

(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, but may produce wastewater for disposal if an iron-air type battery is selected for the BESS (see below for discussion of the proposed BESS). Iron-air batteries, such as Form Energy, consume water due to evaporative losses of the water-based electrolyte; a 250-MW iron-air battery could discharge about 5 to 10 million gallons of wastewater. Similar to solar array/vehicle washing wastewater, the BESS wastewater is anticipated to have an extremely high evaporation and infiltration rate at the site; however, any excess BESS wastewater that doesn't evaporate/infiltrate will be collected for transport off-site. Further details of stormwater drainage during construction and operations are provided in Exhibit K of this NOI and will be discussed further in the ASC.

(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 solar 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 have a transmission line that, by itself, is an energy facility under the definition in ORS 469.300. The collector substations will collect generation output from the 34.5-kV collector lines and step voltage up to an expected 230-kV gen-tie transmission line for delivery to the Facility's POI at PacifiCorp's Apex 230/500-kV substation (gen-tie options described below). The Facility may also interconnect to the existing PGE Grassland 500-kV Switchyard as a secondary 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, liquefication 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 BESS, collector substations, O&M building(s), gen-tie transmission line, site access and service roads, perimeter fencing and gates, and temporary construction yards. The following descriptions are preliminary and based on the best available information at this time and may be modified in the ASC and at final design during preconstruction:

- **Battery Energy Storage System.** The Facility is anticipated to include up to 500 MW of BESS (up to 250 MW each for the two anticipated construction phases, respectively) either centralized or distributed within the Facility site boundary. The BESS can store and later deploy energy generated by the Facility. Many battery manufacturer options are under consideration as the technology continues to rapidly evolve; technologies being considered include Form Energy iron-air batteries as well as other BESS types and will be further described in the ASC. The battery options are anticipated to use a series of self-contained enclosures located on suitable foundations and enclosed by fencing. Some of the BESS options under consideration include fire suppression systems.
- **Collector Substations.** Up to two collector substations are anticipated to be used for the proposed Facility. These new substations will collect generation output from the 34.5-kV collection system and step it up for delivery to the 230-kV gen-tie transmission line. Prior to construction, the collector substation sites will be cleared and graded, with a bed of crushed rock applied for a durable surface. The collector substations are anticipated to consist of circuit-breakers, power transformer(s), bus and insulators, disconnect switches, relaying, battery and charger, surge arrestors, alternating current and direct current supplies, control enclosure, metering equipment, grounding, associated control wiring, and other equipment that will be determined at final design. Junction boxes for the 34.5-kV collection lines may be installed adjacent to the substations but outside the security fencing to allow for disconnection of circuits without entering the substations.
- **Operations and Maintenance Building(s).** Up to two O&M buildings are anticipated for the proposed Facility (to be shared by all construction phases), located adjacent or within the solar array area in a location that is safe and has efficient access to County road(s). The O&M building(s) may include a kitchen, restrooms, offices, meeting space, workshops, and supervisory control and data acquisition system. Graveled parking and a storage area for employees, visitors, and equipment will be located adjacent to the O&M building(s) as well as a shop space for storage of spare parts and equipment. The building(s) will have an onsite well and will have a septic system. Power will be supplied by a local service provider using overhead and/or underground lines. The property proposed for one of the O&M buildings contains existing structures (i.e., residential home, agricultural outbuildings, and a windmill) that may be demolished and removed prior to construction of the O&M building.
- **Generation-tie Transmission Line.** The collector substations will interconnect to the POI via a new single- or double-circuit 230-kV gen-tie line. The specific location and length of the gen-tie line is not yet known, and could vary based on the location of the collection

substations and final design considerations for gen-tie pole locations; thus, five gen-tie corridor options are under consideration:

- Gen-tie Option 1: 14 miles, 500 corridor acres
- Gen-tie Option 2: 1 mile, shared corridor with Option 1 (see Figure 2)
- Gen-tie Option 3: 3 miles, 98 corridor acres
- Gen-tie Option 4: 3 miles, 98 corridor acres
- Gen-tie Option 5: 5 miles, 30 corridor acres

The gen-tie line will be within the Facility site boundary and will cross areas designated as special military airspace that will influence the height of gen-tie structures (see below).

- **Site Access and Service Roads.** The Facility is anticipated to utilize existing access roads to the extent practicable; the Applicant intends to use County roads for construction access and shall pursue a Road Use Agreement with Morrow County for the maintenance and repair of County roads damaged by construction. Primary transportation corridors to the Facility include I-84 and OR-74. The bulk of the site is accessible via OR-74. New service roads will be constructed within the Facility site boundary to provide access to Facility infrastructure; access points connecting to County roads would be gated to prevent public access. New access roads would provide an all-weather drivable, compacted gravel surface from the County road(s) to each inverter/transformer station, measuring 16 feet wide with a typical cross section of 20 feet. Access routes to the gen-tie line will be unimproved two-track type roads to each pole structure.
- **Perimeter Fencing and Gates.** Wire-mesh perimeter fencing, a minimum of 7 feet in height, is anticipated to enclose the solar array as well as other infrastructure. The perimeter fencing will have lockable gates at the access points to the site from public roads.
- **Temporary Construction Yards.** Temporary construction yards are anticipated to be used for development of the proposed Facility to facilitate the delivery and assembly of materials and equipment, and may also contain temporary contractor offices/trailers, parking, and material/equipment storage. These temporary construction yards may contain temporary storage of diesel and gasoline fuels located in aboveground tanks and within designated secondary containment areas. If temporary concrete batch plant(s) are needed, they will be located within the temporary construction yards. The temporary construction yards will be within the Facility site boundary and are anticipated to be 12 acres per construction phase.

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

Response:

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

- **Solar Array.** The solar modules may be grouped in blocks; size will depend on the solar technology chosen. As the solar modules tilt throughout the day, the height of their top edges will shift accordingly. An example tracking system would rotate up to 60 degrees to the east and west to maximize sun exposure to the modules. The maximum height of the module would be approximately 15 feet when fully rotated. The system height could vary where it spans dips in topography, or if dual use/agrivoltaics are utilized. The tracker system, and associated posts, will be specifically designed to withstand wind, snow, and seismic loads anticipated at the site.
- **Battery Energy Storage System.** The BESS may use a series of self-contained enclosures located either centrally within an up to 125-acre area (for each of the two construction phases, depending on the BESS technology selected) or distributed within the Facility site boundary. Each container holds the batteries, a supervisory control and data acquisition system and power management system, fire prevention system and cooling system/units (as applicable based on the selected battery technology), to be placed either on top of the containers or along the side depending on the equipment selected at final design. The BESS will be enclosed by a 7-foot-tall security fence.
- **Collector Substations.** Each collector substation will occupy up to 14 acres and will be enclosed by its own 7-foot-tall security fence.
- **O&M Building(s).** Up to two one-story O&M building(s) are expected for the proposed Facility, approximately 5,000 to 10,000 square feet in size within the Facility site boundary. A permanent, graveled parking and storage area for employees, visitors, and equipment will be located adjacent to the O&M building(s) (15 parking spots anticipated, one for each operations employee), as well as a 2,000 to 5,000 square-foot detached shop space for storage of spare parts and equipment.
- **Generation-tie Transmission Line**. A 230-kV gen-tie is expected between the collector substations and the Facility POI. The gen-tie line will be supported either by H-frame structures with two steel or wood poles or by steel or wood monopole structures. The structures will rise to a height of approximately up to 200 feet above grade, depending on the terrain, spaced 300 to 700 feet apart; structures will be limited to 100 feet tall where the route crosses military airspace. The specific interconnection components will be described in further detail in the ASC and will be determined by the Applicant during micrositing at final design. Otherwise, the following mileages for each gen-tie corridor option are estimated:
    - Gen-tie Option 1: 14 miles, 500 corridor acres
    - Gen-tie Option 2: 1 mile, shared corridor with Option 1 (see Figure 2)
    - Gen-tie Option 3: 3 miles, 98 corridor acres
    - Gen-tie Option 4: 3 miles, 98 corridor acres
    - Gen-tie Option 5: 5 miles, 30 corridor acres

- **Collector Lines.** The 34.5-kV collector lines may run underground for improved reliability. The collector lines would be directly buried to a minimum depth of 3 feet; however, some portions of the lines may be above ground. If needed, overhead collector line segments will likely be placed on steel or wood monopole structures, up to 75 feet tall. Specific locations and dimensions of overhead collector lines, if necessary, will not be known until site geotechnical work has been completed during preconstruction activities and prior to final design.

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 will include approximately 7,365 acres (and one of five gen-tie corridor options) of privately owned land in Morrow County, Oregon. The Facility is generally bounded by OR-74 to the west, located approximately 5 miles northwest of the town of Ione, Oregon. The site boundary is composed of the townships, ranges, and sections listed in Table C-1.

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

Township and Range[1]	Section[1]
1N 24E	6
1N 23E	1, 2, 3, 10, 11, 12, 13, 14, 15
2N 23E	7, 8, 9, 10, 11, 12, 16, 17, 18, 20, 21, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 35, 36
2N 24E	5, 7, 8, 19. 30, 31
3N 24E	32
1. Location information includes the site boundary and all five gen-tie corridor options under consideration.	

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 does not include a pipeline nor a 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		
Clean Water Act, Section 404	U.S. Army Corps of Engineers, Portland District Attn: Morrow County Contact P.O. Box 2946 Portland, OR 97208-2946 (503) 808-4337 PortlandRegulatory@usace.army.mil	Clean Water Act, Section 404 (33 United States Code [USC] § 1344); 33 Code of Federal Regulations (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 or governed by the site certificate.
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 USC § 44718); 14 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 or governed by the site certificate.

Permit	Agency	Authority/Description
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 or governed by 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 or governed by the site certificate.
State Permits		
Energy Facility Site Certificate	Oregon Department of Energy and EFSC 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 Rules (OAR) Chapter 345, Divisions 1, 21-24 Description: This site certificate is the subject of this NOI.
Airspace Review	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	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.

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, Aquatic Resource Coordinator 951 SW Simpson Avenue, Suite 104 Bend, OR 97702 (503) 910-4565 Richard.W.Fitzgerald@dsl.oregon.gov	Oregon Removal-Fill Law (ORS 196.795 - 196.990); OAR Chapter 141, Divisions 85, 89, 90, 93, 100. Description: A person or utility is required to have a permit if an activity involves 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, this 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), Eastern Region Attn: Patty Isaak, Permit Coordinator for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@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 required, 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.
NPDES Stormwater Discharge Permit 1200-C	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@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 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 projects 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
Air Contaminant Discharge Permit (ACDP)	ODEQ, Eastern Region Attn: Eastern Region Air Quality Permit Coordinator 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (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 or its construction contractor will obtain the appropriate permit from ODEQ for concrete batch plants used during construction. This permit is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
General Water Pollution Control Facilities (WPCF) Permit, WPCF-1700-B	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@deq.oregon.gov	ORS 468B; OAR Chapter 340, Division 45 Description: If solar panel washing is determined to be needed, the Applicant or a construction contractor who will conduct the solar panel washing activities may seek coverage under the WPCF-1700-B permit from ODEQ following completion of construction and before initiating any washing activities. Therefore, this permit should not be included in or governed by the site certificate.
WPCF Permit, WPCF-1000, Gravel Mining and Batch Plant	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator for Eastern Region 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 276-4605 Patty.Isaak@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 construction contractor will obtain a WPCF-1000 permit from the ODEQ, which would therefore not be included in or governed by the site certificate.
On-site Sewage Disposal Construction-Installation Permit	ODEQ, Eastern Region Water Quality On-site Program Attn: Sean Rochette, Technical Assistance 800 SE Emigrant Avenue, Suite 330 Pendleton, OR 97801 (541) 633-2036 Rochette.Sean@deq.state.or.us	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(s). Therefore, this permit should not be included in or governed by the site certificate.

Permit	Agency	Authority/Description
Oversize Load Movement Permit/Load Registration	Oregon Department of Transportation (ODOT) Attn: Ken Patterson, Region 5 Manager Region 5 Headquarters 3012 Island Avenue La Grande, OR 97850 (541) 963-1365 kenneth.e.patterson@odot.oregon.gov	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 construction 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.
Access Management Permit	ODOT Attn: Ken Patterson, Region 5 Manager Region 5 Headquarters 3012 Island Avenue La Grande, OR 97850 (541) 963-1365 kenneth.e.patterson@odot.oregon.gov	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 Offices. If needed, the Applicant's construction contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.
Permit to Occupy or Perform Operations Upon a State Highway	ODOT Attn: Ken Patterson, Region 5 Manager Region 5 Headquarters 3012 Island Avenue La Grande, OR 97850 (541) 963-1365 kenneth.e.patterson@odot.oregon.gov	OAR Chapter 734, Division 55 Description: Utility installations within the right-of-way of a state highway in Oregon require a permit issued by the ODOT. If needed, the Applicant's construction contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.
Water Right Permit or Water Use Authorization	Oregon Water Resources Department Water Rights Section, District 5 Attn: Greg Silbernagel, Watermaster 116 SE Dorion Avenue Pendleton, OR 97801 (541) 278-5456 Greg.M.Silbernagel@water.oregon.gov	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.
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@oprd.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.

Permit	Agency	Authority/Description
Electrical Permit	State of Oregon Building Codes Pendleton Field Office Attn: Katherine Denight, Permit Technician 800 SE Emigrant Avenue, Suite 360 Pendleton, OR 97801 (541) 276-7814 Building.department@dcbs.oregon.gov	OAR 918, Division 309 Description: A state electrical permit is required prior to the installation of electric, phone, or cable service to any Facility infrastructure. Electrical permits may be obtained in person at the Building Codes Division Pendleton office, or online through the state's e-permitting system (available at: https://aca-oregon.accela.com/oregon/Default.aspx). A state electrical permit will be obtained by the construction contractor prior to construction of each component for which electrical, phone, or cable service will be required and therefore should not be included in or governed by the site certificate.
Building Permit	State of Oregon Building Codes Pendleton Field Office Attn: Katherine Denight, Permit Technician 800 SE Emigrant Avenue, Suite 360 Pendleton, OR 97801 (541) 276-7814 Building.department@dcbs.oregon.gov	OAR 734, Division 51; Chapter 918, Divisions 309 & 780; Oregon Structural Specialty Code Description: In Morrow County building permits are administered by the State of Oregon Building Codes Pendleton Field Office. A building permit is required for review and approval prior to commencement of construction of energy facilities. A building permit will be obtained by the construction contractor prior to construction of each component for which a building permit would be required; therefore, this permit should not be included in or governed by the site certificate.
Local Permits		
Conditional Use Permit and Zoning Permit	Morrow County Planning Department Attn: Tamra Mabbott, Planning Director P.O. Box 40 215 NE Main Avenue Irrigon, OR 97844 (541) 922-4624 tmabbott@co.morrow.or.us	Morrow County Comprehensive Plan; Morrow County Zoning Ordinance Article 3, Section 3.010; Article 4, Sections 4.010-4.070; Article 6, Sections 06.015-6.050 Description: The Applicant elects to obtain an EFSC determination under ORS Chapter 469.504(1)(b). Under ORS 469.401(3), following issuance of the site certificate, the County, upon the applicant's submission of the proper application and fee, shall issue the permits addressed in the site certificate, subject only to the conditions set forth in the site certificate and without hearings or other proceedings. Because EFSC will make the land use determination, this permit should be included in and governed by the site certificate.

Permit	Agency	Authority/Description
Floodplain Development Permit	Morrow County Planning Department Attn: Tamra Mabbott, Planning Director P.O. Box 40 215 NE Main Avenue Irrigon, OR 97844 (541) 922-4624 tmabbott@co.morrow.or.us	Morrow County Comprehensive Plan; Morrow County Zoning Ordinance, Article 3, Section 3.100 Description: A Floodplain Development Permit is required prior to construction or development within any special flood hazard area, within the overlay zone. If required, this permit will be obtained by the construction contractor prior to construction. Therefore, this permit should not be included in or governed by the site certificate.
Utility and Approach Permits	Morrow County Public Works Attn: Eric Imes, Public Works Director P.O. Box 428 Lexington, OR 97839 (541) 989-9500 eimes@co.morrow.or.us	ORS 374.305 to 374.325; Morrow County Zoning Ordinance Article 4, Section 4.010(B) Description: A Utility Permit is required to install a utility within or across a county road right-of-way. An Approach Permit will be required for new project access points with county roads, or for upgrades to existing county roads. If required, these permits will be obtained by the construction contractor prior to construction. Therefore, this permit should not be included in or governed by the site certificate.
Temporary Access/Work in Road Right-of-Way Permits	Morrow County Public Works Attn: Eric Imes, Public Works Director P.O. Box 428 Lexington, OR 97839 (541) 989-9500 eimes@co.morrow.or.us	Morrow County Zoning Ordinance Article 4, Section 4.010(B) Description: A Work in Road Right-of-Way Permit is required to make improvements to access roads that intersect with county road rights-of-way or to make improvements to existing public roads. If required, this permit will be obtained by the construction contractor prior to construction. Therefore, this permit should not be included in or governed by the site certificate.
Oversize Load Movement Permit	Morrow County Public Works Attn: Eric Imes, Public Works Director P.O. Box 428 Lexington, OR 97839 (541) 989-9500 eimes@co.morrow.or.us	Morrow County Zoning Ordinance Section 4.010(B) Description: An Oversize Load Movement Permit will be required to transport loads that exceed standard size and/or weight limits on county roads. If required, this permit will be obtained by the construction contractor 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 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 Facility's site boundary. The Facility is located in the Morrow County Exclusive Farm Use zoning district (EFU; see 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 the Department (ODOE) in accordance with OAR 345-020-0011(1)(f)(B). Tax lot boundaries and assessor information for Morrow County were obtained from the Morrow County Assessor on December 16, 2025, and from the Gilliam County Assessor on December 17, 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;

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 Morrow County's EFU zoning district.
- **Figure 4** identifies the study areas and their associated mileage 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.
- **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), National Hydrography Dataset (NHD), and Federal Emergency Management Agency (FEMA).
- **Figure 8** shows the permitted energy facilities within 10 miles of the proposed site boundary. Additionally, existing transmission lines and existing substations 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 Facility 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 study area for land use, wildfire risk, and fish and wildlife habitat; a 5-mile study area for recreational opportunities and threatened and endangered plant and animal species; a 10-mile study area for scenic resources and public services; and a 20-mile study area for protected areas.

(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(26) 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.

(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:

Several energy generation and transmission facilities permitted or proposed under EFSC are within 10 miles of the proposed site boundary, such as the Sunrise Solar and Storage Project, Wagon Trail Solar Project, Wheatridge Renewable Energy Facility, Carty Generating Station, Montague Wind, Shepherds Flat North, Central, and South, Boardman Solar Energy Facility, Leaning Juniper IIA and IIB, and the Oregon Trail Solar (see Figure 8 for the full list). Existing transmission lines and

substations are also within 10 miles of the Facility (see Figure 8). 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 Morrow 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 Morrow 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 wetlands and waters of the state or of the United States); wildlife and wildlife habitat; threatened and endangered plant and animal species; historic, cultural, and archaeological resources; scenic and aesthetic areas; recreation; protected areas; land use; and wildfire risk. The following discussions are based on the analysis area for each resource, as defined in OAR 345-001-0010(35) and shown in Figure 4. The analysis 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 wetlands and 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. Solar modules, 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 89 (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

The Facility will not discharge pollutants to surface water or groundwater. Temporary impacts due to construction stormwater runoff will be controlled in compliance with a NPDES 1200-C permit to be issued by ODEQ, which will include an Erosion and Sediment Control Plan. If a temporary concrete batch plant is needed for construction, the Facility will also obtain NPDES 1200-A and WPCF-1000 permits from ODEQ. During construction, employees will use on-site portable toilets; waste will be disposed of off-site by a licensed contractor. During operation, restroom facilities within the O&M building(s) will be served by a septic system. Additionally, during operations, the wastewater produced from array cleaning, vehicle washing, and BESS discharge (if Form Energy iron-air batteries are selected) is anticipated to have an extremely high evaporation and infiltration rate at the site; however, any excess BESS wastewater that doesn't evaporate/infiltrate will be collected for transport off-site.

Surface and Groundwater Availability

During 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. For example, water usage for dust control will be greater during the dry, windy conditions of summer than at other times of year.

Water is anticipated to come from nearby private or municipal sources with existing water rights. The expected water usage during Facility construction 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 tanks. Additionally, the Applicant will confirm

with the appropriate municipality that the anticipated amount of water needed for Facility construction will be available.

During operations, water may be provided to the O&M building(s) by an on-site permit exempt well; the average amount of water used at the O&M building(s) will be less than 5,000 gallons per day during operations. Generally, water during operations will be predominately used for the BESS (if Form Energy iron-air batteries are selected), solar panel washing, sheep drinking water (during grazing periods), and washing Facility vehicles. Water for these uses will be trucked to the Facility from private or municipal sources with existing water rights/licenses. Water will either be used immediately or stored in multiple 10,000-20,000-gallon tanks distributed throughout the Facility site boundary.

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. Canals/ditches, perennial, intermittent, and ephemeral streams cross through and around the proposed site boundary according to the NHD (USGS 2025). There is also a freshwater pond within the proposed site boundary according to the NWI (USFWS 2025a). Areas that intersect the gen-tie corridor options and eastern boundary of the proposed site boundary contain FEMA-designated flood hazard areas. An in-depth analysis of wetlands and waters will be provided in the ASC including detail on 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, land cover within the Facility site boundary is primarily cultivated crops, herbaceous, shrub/scrub, and developed open space (MRLC 2024). The site boundary also contains small areas of low- and medium-intensity development, hay/pasture, and deciduous forest.

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

Land Cover Type	Area (acres)[1]	Percent of Total Area[1]
Cultivated Crops	6,307	85.6%
Herbaceous	487	6.6%
Shrub/Scrub	305	4.1%
Developed, Open Space	183	2.5%
Developed, Low Intensity	40	0.5%
Developed, Medium Intensity	30	0.4%
Hay/Pasture	13	0.2%
Total	**7,365**	**100%**

Land Cover Type	Area (acres)[1]	Percent of Total Area[1]
1. Values may not add up to the total due to rounding. Acreage amount includes the site boundary and all five gen-tie corridor options under consideration.		

Wildlife surveys will be performed to determine what species are present within the site boundary. Habitat surveys are underway to evaluate habitat functions and values present to support wildlife within the Facility site boundary. Habitat surveys will be informed 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). A more in-depth analysis of specific species and their habitats will be provided in the ASC.

Sensitive, Threatened, and Endangered Species

The Applicant will consider a variety of publicly available resources to determine the threatened, endangered, and sensitive species that may occur within the site boundary and surrounding area. The Applicant is conducting habitat and general wildlife pedestrian surveys (see above), as well as raptor nest surveys within the Facility site boundary and a 0.5-mile buffer. Wildlife observations and wildlife signs (e.g., scat, tracks, burrows, stick nests, etc.) of both special status wildlife and all wildlife in general (e.g., big game) will be documented. An analysis of potential impacts to sensitive, endangered, and threatened species will be provided in the ASC including minimization and mitigation measures developed as necessary in coordination with the ODFW.

Historic, Cultural, and Archaeological Resources

The Applicant is conducting cultural resource surveys within the Facility site boundary. These surveys will evaluate the presence or absence of historic properties and other cultural resources that may or may not meet the threshold of significance necessary to qualify them as historic properties. 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 or historic sites discovered during the field investigation will be officially recorded and filed with the Oregon State Historic Preservation Office. If an archaeological or historic site is identified, the Applicant will undertake the appropriate avoidance or mitigation actions to avoid significant impacts as applicable.

Scenic Resources

The analysis 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."

Land use management plans to be considered include the Morrow County Comprehensive Plan and local comprehensive plans for jurisdictions within 10 miles of the Facility site boundary. The visual assessment included with the ASC will include proposed mitigation measures, if needed, for significant potential impacts identified through the ASC process. A significant scenic resource that is traversed by the project is the Blue Mountain Scenic Byway (i.e., OR-74).

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 camping, cycling, fishing, hiking, and biking (Morrow County 2025a). 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 within Morrow County's EFU zoning district. Applicable development standards for this zone will be addressed in the Land Use Exhibit of the ASC. Land within the site boundary is primarily vacant/undeveloped, but some of it is used for agricultural uses. Impacts to agricultural land will also be further discussed in the Land Use Exhibit of the ASC.

The Facility will potentially use and occupy more than 12 acres of high value farmland and/or 20 acres of arable land, which would require an exception to Oregon Statewide Planning Goal 3, Agricultural Lands. A Goal 3 exception will be evaluated in the Land Use Exhibit of the ASC, as applicable, as required by OAR 345-022-0030.

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 Wildlife Risk Explorer shows the study area has a low to high burn probability, with average flame lengths generally ranging from 0 to 12 feet (ODF 2025). During construction, water trucks will be on-site for dust management and can provide water to support fire control if/as needed. The Wildfire Prevention and Risk Mitigation 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. Prior to construction, the Applicant will coordinate with the Ione Rural Fire Protection District (RFPD) and continue to do so through all stage of Facility development. The Applicant will develop and implement Wildfire Mitigation Plans in compliance with OAR 345-022-0115(1)(b), which will include appropriate mitigation measures for the proposed Facility infrastructure.

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 in this rural area is limited to on-site septic systems. During construction and operation, sanitary waste will be collected on-site in portable toilets that will be provided and maintained by a licensed subcontractor. The Applicant is proposing up to two O&M buildings that may include a kitchen, restrooms, offices, meeting space, workshops, and supervisory control and data acquisition system. A septic system will be necessary to support the building. Required permits to construct the system will be obtained from Morrow 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 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. As currently proposed, the anticipated water source is water obtained from existing private or municipal water sources with existing water rights and trucked to the site. 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 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.

During operations, the primary water use will be at the O&M building(s) and could be used for a kitchen, drinking, showers, and toilets. Generally, water used during operations at the O&M building(s) is anticipated to be under 5,000 gallons per day. Additionally, water will be used for the BESS (if Form Energy iron-air batteries are selected), solar panel and vehicle washing, and sheep drinking water as needed; water for these uses will be trucked to the Facility from private or municipal sources with existing water rights/licenses.

Stormwater Drainage

The proposed Facility will not have significant adverse impacts on stormwater drainage services or infrastructure, due to the rural nature of the area and minimal existing stormwater infrastructure in the area. Stormwater from access roads and solar panels is expected to be minimal and will flow to the adjacent ground and infiltrate on-site.

For construction, the Applicant will obtain a NPDES 1200-C Permit and prepare an Erosion and Sediment Control Plan. Construction stormwater will be handled in accordance with the terms of the permit. Stormwater management infrastructure put in place during construction will be left in place as needed, to continue functioning throughout the life of the Facility where impermeable or semi-impermeable surfaces (e.g., access roads) remain to support O&M activities. Such features may include roadside ditches, infiltration swales, or retention basins. 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; therefore, the Facility will have no impact on stormwater drainage services provided in urban areas.

Solid Waste Management

Potential impacts on the ability of communities to provide solid waste management services could occur if the solid waste management needs from the proposed Facility during construction or operations cannot be met through existing facilities or if meeting those demands interferes with the

ability of service providers to meet other community waste management needs (e.g., if local landfill capacity is inadequate to handle the needs of the proposed Facility).

Morrow County provides solid waste disposal and recycling services through franchise agreements with various private providers. The public landfill closest to the Facility is the Finley Butte Regional Landfill, located approximately 10 miles south of Boardman, Oregon, and 12 miles east of the site boundary; Waste Management in Arlington, Oregon is also located 15 miles west of the site boundary. Solid waste generated at the Facility during construction activities will be non-hazardous. Waste materials generated through the construction of the solar array, BESS, 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. Further, the Applicant will coordinate with waste and recycling franchisees servicing the Facility to maintain required records, as mandated by Morrow County's Solid Waste Management Ordinance.

The O&M building(s) will generate small amounts of solid waste during operation of the Facility. Typical waste will include paper, plastic, and food. Replacement of equipment throughout the lifetime of the Facility will produce scrap metal, solar panels, and inverters. Recycling programs if offered by the solar module manufacturer will be utilized if available. The Applicant will contract with a specific hazardous waste disposal for periodic disposal of batteries from the BESS.

The proposed Facility will, therefore, not have any significant adverse impact on the ability of any community in the area to provide solid waste management services.

Housing

Construction

While the construction timeframe and potential phasing of project construction have yet to be determined, the Applicant anticipates a maximum of 500 construction personnel on-site at one time, and this number will fluctuate due to multiple disciplines of contractors that will need to complete their work simultaneously during construction.

The construction workforce will include a wide variety of specialized workers for certain construction tasks such as solar array and BESS installation. Construction workers hired from outside the local area will need temporary housing. The amount of temporary housing will depend on the percentage of workers hired from outside of the local area. The percentage of the construction workforce that is hired locally will depend on the availability of workers with appropriate skills. This percentage is continually growing due to the number of solar energy projects that are being built in eastern Oregon. For employees hired nonlocally, there are several options for temporary housing within a commutable distance to the site, such as Hermiston and Boardman. 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 analysis area. Due to the number of regional communities that workers can choose for housing, their impact to 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.

Operation

The Applicant does not anticipate significant impacts to housing in the surrounding community as a result of Facility operations. A typical large-scale solar facility operation may employ up to 15 people for day-to-day operations and maintenance, with staff focused on maintenance tasks like monitoring equipment, cleaning panels, and responding to minor issues.

Traffic Safety

Primary transportation corridors for the Facility include I-84 and OR-74. These primary transportation routes will carry heavy-duty and light-duty delivery vehicles and workforce traffic during construction of the Facility. Heavy-duty trucks will generally hold concrete, gravel, and larger materials needed for construction of the Facility. Light-duty trucks typically carry water and electrical equipment. A traffic management plan will be developed in cooperation with Morrow County to minimize impacts on traffic safety. In addition, the Applicant will pursue a Road Use Agreement with Morrow County to ensure that public roads impacted by construction will be left in "as good or better" condition than that which existed prior to the start of construction.

During operation, significant traffic impacts from the Facility are not anticipated. Facility equipment will be continuously monitored remotely. Operations and maintenance will include periodic inspection and a scheduled maintenance program, along with a minimal number of seasonal vegetation maintenance personnel. Specialized personnel responsible for occasional inspections of the solar array may be hired from outside the area and may travel in light-duty trucks to the Facility. Delivery trucks may also access the Facility during operation on an infrequent basis. 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

The Morrow County Sheriff's Office and Oregon State Police provide police services for Morrow County (Morrow County 2025b). The Applicant will provide on-site security, and effective communications will be established between on-site security personnel and the Morrow County Sheriff's Office. As necessary, back-up law enforcement will be available from the Oregon State Police, with offices in The Dalles, Madras, and Hermiston. Construction and operation of the Facility are not anticipated to place significant new demands on the provision of law enforcement in the vicinity of the Facility site boundary or in nearby communities.

The Facility is within the Ione RFPD coverage area (OOSFM 2025). The Applicant will work with the appropriate RFPD to address any 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 RFPD 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 firefighting equipment and water supplies on hand during operations that carry a high fire risk, conducting welding within a cleared or graveled area, and parking of vehicles in designated, unvegetated areas. 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 near the Facility, hospitals and medical centers tend to be regional. The closest hospital is Good Shepherd Medical Center, located approximately 11.3 miles northeast of the Facility site boundary in Hermiston, followed by Pioneer Memorial Hospital, located 22 miles southeast in Heppner. Good Shepherd is also considered a Level III trauma center (Oregon Health Authority 2025). The Morrow County Health District's Emergency Medical Services provides ambulance service in the area (Morrow County Health District 2025). Some of the nearby fire districts also have First Response Vehicles, with equipment and crew trained to stabilize a patient until the arrival of an ambulance for transport. In the event of a serious injury during construction or operation of the Facility, the patient may be flown by helicopter (operated by Life Flight) to one of the two Level I trauma centers located in Portland: Oregon Health & Science University Hospital or Legacy Emanuel Medical Center.

As per the Occupational Safety and Health Administration's regulations for sites with greater than 100 workers on-site, the Applicant anticipates that a safety manager will be on-site during Facility construction. Having site-specific procedures and a dedicated individual on-site to deal with health and safety matters ensures appropriate oversight and timely response to potential incidents that may occur during Facility construction.

Impacts on health care could occur if Facility construction activities or increases in temporary residents during construction were to result in an increase in the use of routine and emergency health care services exceeding the capacity of local providers. Impacts on local health care services will be minimized by careful management of on-site health and safety risks. The small number of new temporary residents is not expected to place significant new demands on the health care facilities that serve the area.

Schools

The site boundary falls within the Ione School District (OHCS 2025). The schools closest to the Facility are Ione High School and Heppner Junior/High School, located 5.6 miles and 22 miles southeast of the Facility site boundary, respectively. Other nearby school districts (most of which

are outside of the analysis area) that may experience an increase in enrollment due to the Facility include the Umatilla, Hermiston, Stanfield, Echo, Pilot Rock, and Pendleton school districts in Umatilla County; and the Richland, Kennewick, Prosser, Kiona-Benton City, and Finley school districts in Benton County, Washington. Construction work for the proposed Facility will be short term and few, if any, workers temporarily relocating to the area are expected to be accompanied by family members. In addition, some of the peak construction work period will occur during the summer months when school is not in session. Therefore, little to no construction-related impacts on schools are expected. Operation of the Facility will require approximately 15 permanent employees. Some employees may be hired locally, and others may relocate from outside the region with their families. Conservatively estimating that a maximum of 15 employees are hired from outside the region and on average, each brings two school-age children, up to approximately 30 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. As a result, construction and operation of the Facility is not expected to substantially affect local school enrollment. Additional information will be provided in the ASC.

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 in Figure 6. The Protected Areas Exhibit of the ASC will include more detailed analysis of the potential impacts to protected areas.

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	19.7	SW	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)	Umatilla National Wildlife Refuge	9.9	NE	U.S. Fish and Wildlife Service (USFWS) 72650 Riverview Lane Irrigon, OR 97844 (509) 546-8300 No email listed	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 2025c
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)	None	N/A	N/A	N/A	BLM 2025a, Google Earth 2025, USGS 2024
Area of Critical Environmental Concern OAR 345-001-0010(26)(i)(A)	Horn Butte Curlew Area of Critical Environmental Concern	0.9	NW	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	BLM 2025b, BLM 2025c, BLM 2025d, BLM 2025e, Google Earth 2025, OPRD 2020, USFS 2025b, USGS 2024
Outstanding Natural Area OAR 345-001-0010(26)(i)(B)	None	N/A	N/A	N/A	

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**				
Research Natural Area OAR 345-001-0010(26)(i)(C)	Boardman Research Natural Area	6.3	NE	BLM P.O. Box 2965 Portland, OR 97208 (503) 808-6001 Blm_or_so_land_office_mail@blm.gov	
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	19.2	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
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)	Lindsay Prairie Preserve	9.5	E	The Nature Conservancy (TNC) 821 SE 14th Avenue Portland, OR 97214 (503) 802-8100 oregon@tnc.org	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
State Scenic Waterway OAR 345-001-0010(26)(n)	None	N/A	N/A	N/A	Google Earth 2025, OPRD 2025c, OPRD 2025d, USGS 2024
State Wildlife Refuge or Management Area OAR 345-001-0010(26)(o)	Columbia Basin – Willow Creek Wildlife Area	6.3	NW	Oregon Department of Fish and Wildlife (ODFW) 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	Google Earth 2025, ODFW 2025a, 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				
	Columbia Basin – Coyote Springs Wildlife Area	13.7	NE	ODFW 73471 Mytinger Lane Pendleton, OR 97801 (541) 276-2344 odfw.info@odfw.oregon.gov	
Fish hatchery operated by the Oregon Department of Fish and Wildlife OAR 345-001-0010(26)(p)	Umatilla Hatchery	20.0	NE	ODFW 73959 Riverview Lane Irrigon, OR 97844 (541) 922-5659 odfw.info@odfw.oregon.gov	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 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. As currently proposed, anticipated sources include existing private or municipal water sources with existing water rights. Water from these sources will be trucked to the site. 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. Water will only be obtained from permitted sources with adequate water rights.

Operation

During operations, the primary water use will be at the O&M building(s) and may be used for a kitchen, drinking, showers, and toilets. Generally, water used during operations at the O&M building(s) is anticipated to be under 5,000 gallons per day. Additionally, water will be used for the BESS (if Form Energy iron-air batteries are selected), solar panel and vehicle washing, and sheep drinking water as needed. Water for these uses will be trucked to the Facility from private or municipal sources with existing water rights/licenses. Iron-air batteries, such as Form Energy, consume water due to evaporative losses of the water-based electrolyte; a 250 MW iron-air battery could use approximately 20 to 40 million gallons of water per year in operation.

(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 solar photovoltaic power generation and storage 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 345-024-500.*

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 – Habitat Conservation Division	OAR 345-022-0060 Fish and Wildlife Habitat and OAR 345-022-0070 Threatened and Endangered Species Habitat Conservation 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(2) and (3) 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)	Department of Land Conservation and Development 635 Capitol Street NE, Suite 150 Salem, OR 97301 (503) 373-0050
Morrow County Planning Department	OAR 345-022-0030(2)(a) Land Use Morrow County Zoning Ordinance	Morrow County Planning Department P.O. Box 40 215 NE Main Avenue Irrigon, OR 97844 (541) 922-4624

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	Q4 2025
ODOE reviews the NOI, distributes public notice, conducts public information meeting as needed, facilitates comment period, and issues Project Order	Q4 2025 – Q1 2026
Applicant submits Preliminary ASC to ODOE	Q1 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 submitted a letter to 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 July 29, 2025, the Legislative Commission provided a letter 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

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Figures

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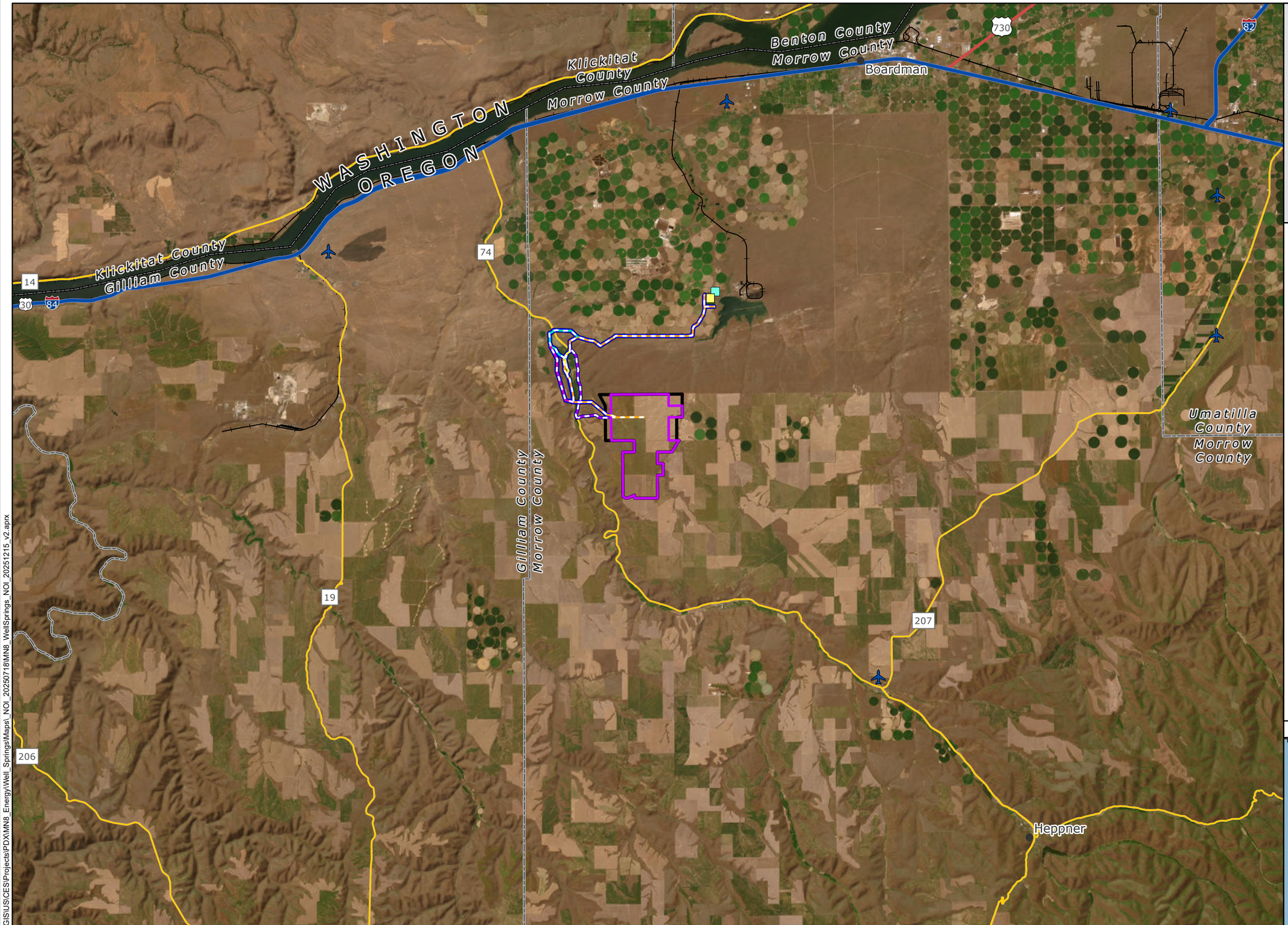
Well Springs Solar Project

Figure 1
Site Vicinity

MORROW COUNTY, OR



- Facility Site Boundary
- Micrositing Corridor
- Gen-Tie Corridor

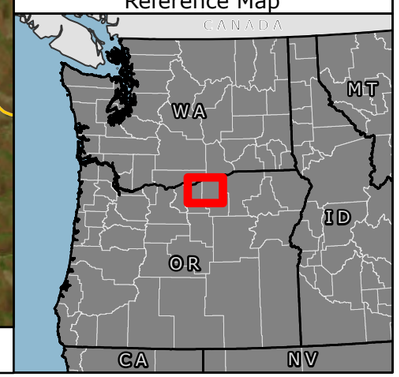
Proposed Gen-Tie

- Option 1
- Option 2
- Option 3
- Option 4
- Option 5
- POI: PacifiCorp Apex
- POI: PGE Grassland
- County Boundary
- State Boundary
- City/Town
- Interstate Highway
- US Highway
- State Highway
- Airport
- Railroad

TETRA TECH

MN

Reference Map



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Well Springs Solar Project

Figure 2
Facility Site Overview

MORROW COUNTY, OR

- Facility Site Boundary
- Micrositing Corridor
- Gen-Tie Corridor
- POI: PacifiCorp Apex
- POI: PGE Grassland
- County Boundary
- City/Town
- State Highway
- Local Roads
- Substation
- 115 kV Transmission Line
- 230 kV Transmission Line
- 500 kV Transmission Line
- Railroad

Preliminary Facility Infrastructure

- BESS
- Laydown Area
- Access Roads
- Solar Modules

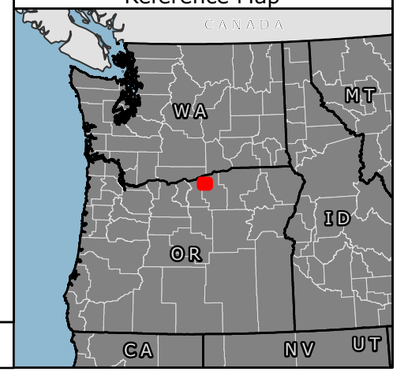
Proposed Gen-Tie

- Option 1
- Option 2
- Option 3
- Option 4
- Option 5

TETRA TECH

MN

Reference Map



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Gilliam County
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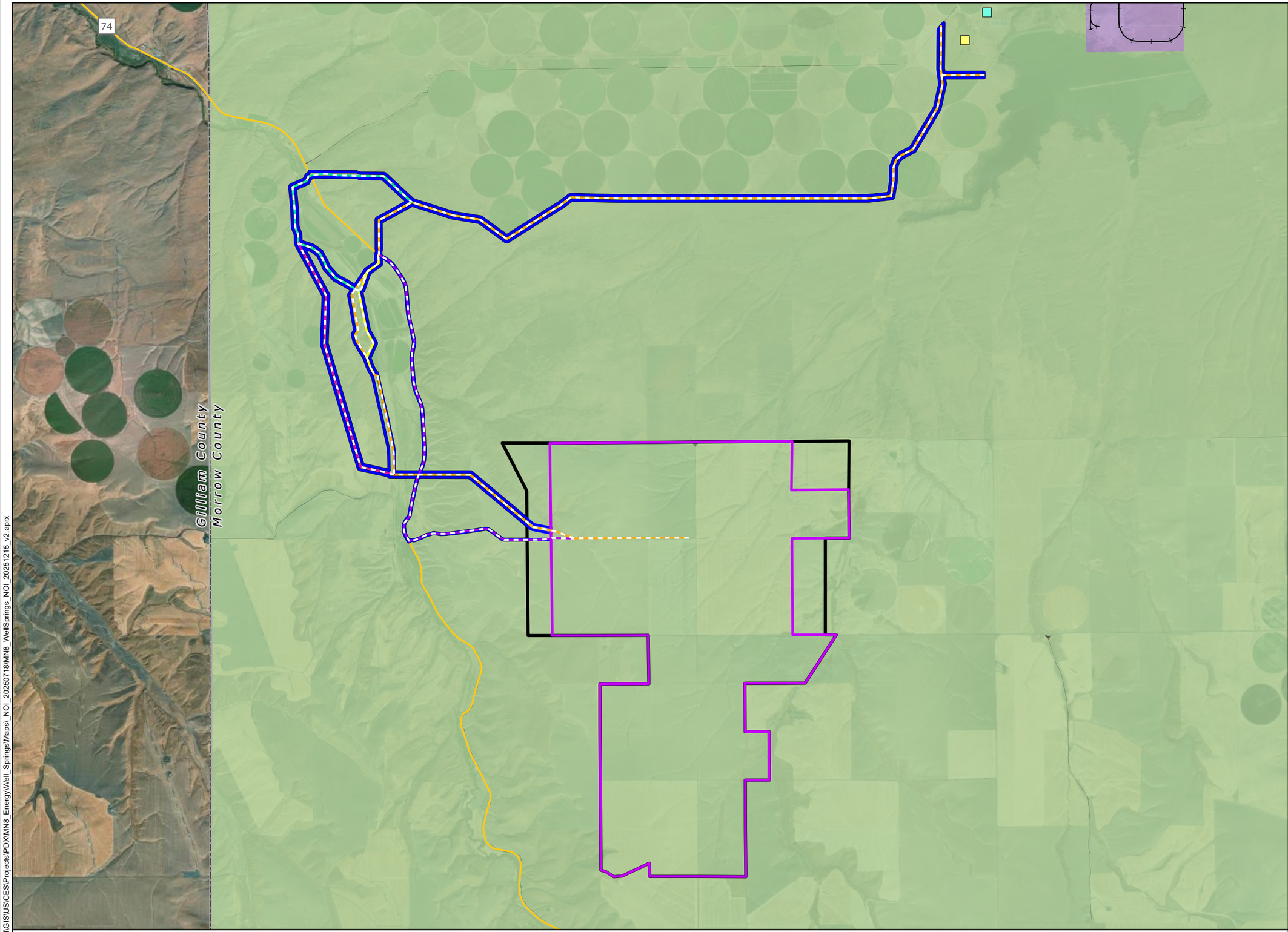
Well Springs Solar Project

Figure 3
Zoning

MORROW COUNTY, OR



- Facility Site Boundary
- Micrositing Corridor
- Gen-Tie Corridor

Proposed Gen-Tie

- Option 1
- Option 2
- Option 3
- Option 4
- Option 5
- POI: PacifiCorp Apex
- POI: PGE Grassland
- County Boundary
- City/Town
- State Highway
- Railroad

Morrow County Zoning

- Exclusive Farm Use
- General Industrial

TETRA TECH

MN8

Reference Map

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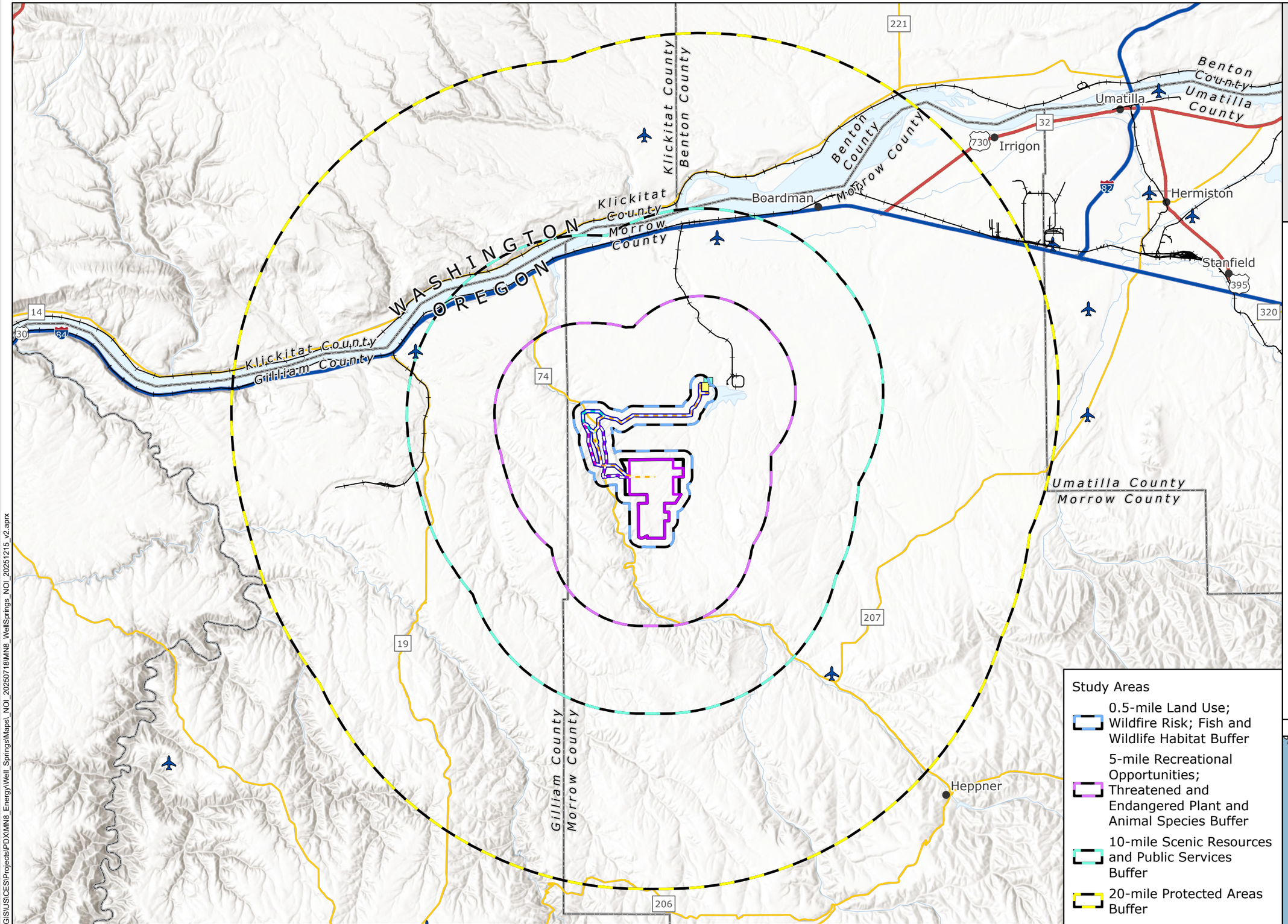
Well Springs Solar Project

Figure 4
Study Area Boundaries

MORROW COUNTY, OR



- Facility Site Boundary
- Micrositing Corridor
- Gen-Tie Corridor

Proposed Gen-Tie
- Option 1
- Option 2
- Option 3
- Option 4
- Option 5

- POI: PacifiCorp Apex
- POI: PGE Grassland
- County Boundary
- State Boundary
- City/Town
- Interstate Highway
- US Highway
- State Highway
- Airport
- Railroad

Study Areas
- 0.5-mile Land Use; Wildfire Risk; Fish and Wildlife Habitat Buffer
- 5-mile Recreational Opportunities; Threatened and Endangered Plant and Animal Species Buffer
- 10-mile Scenic Resources and Public Services Buffer
- 20-mile Protected Areas Buffer

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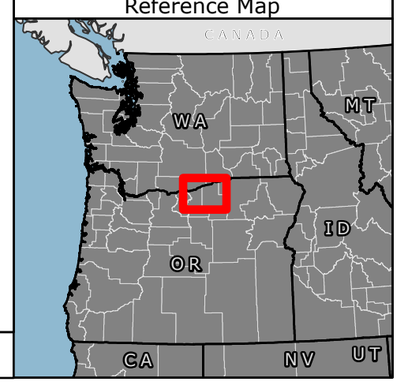
Reference Map



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Well Springs Solar Project

Figure 5
Topography

MORROW COUNTY, OR

- Facility Site Boundary
- Micrositing Corridor
- Gen-Tie Corridor

Proposed Gen-Tie

- Option 1
- Option 2
- Option 3
- Option 4
- Option 5
- POI: PacifiCorp Apex
- POI: PGE Grassland

TETRA TECH

MN

Reference Map

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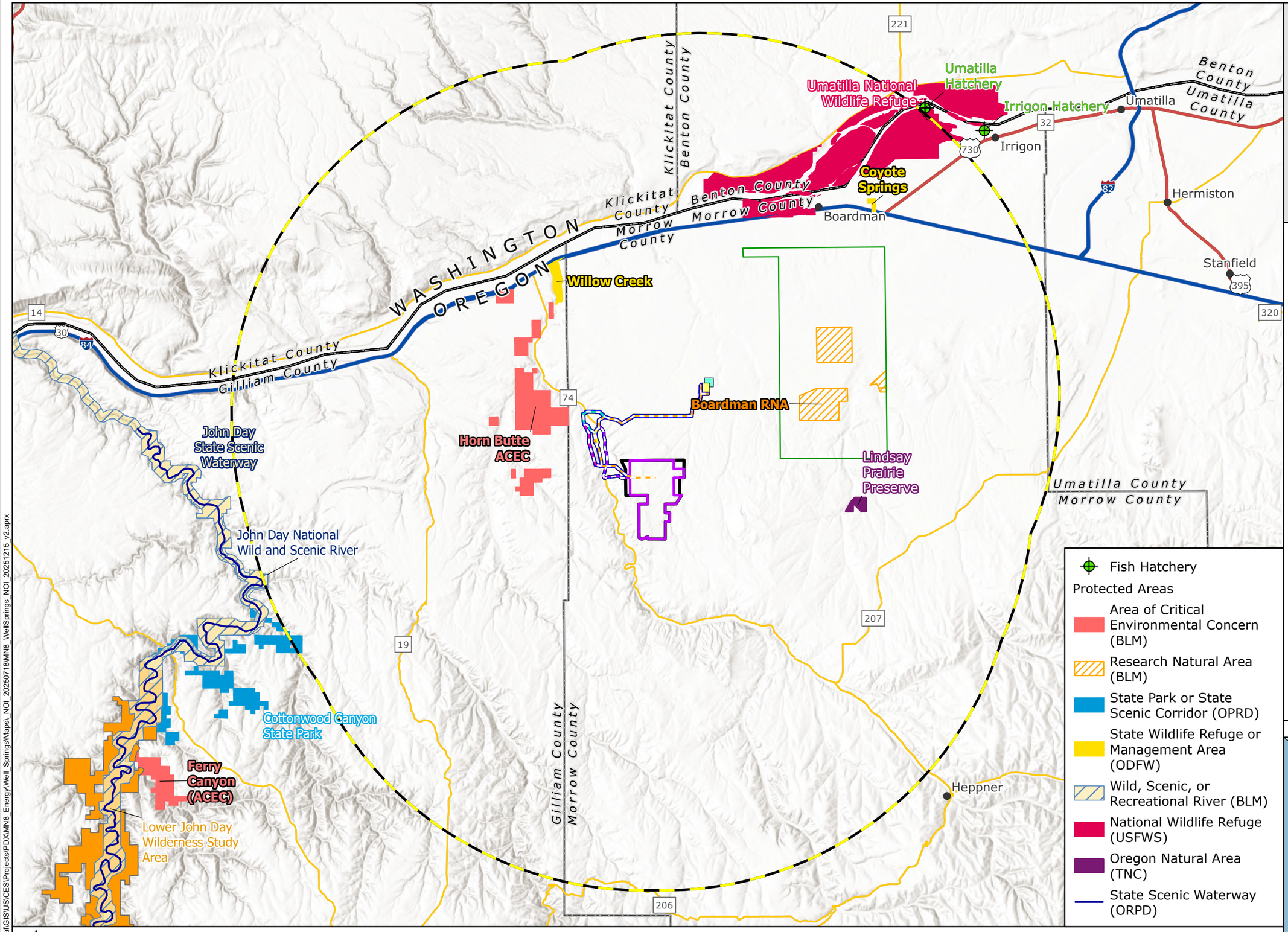
Well Springs Solar Project

Figure 6
Protected Areas

MORROW COUNTY, OR



- Facility Site Boundary
- Micrositing Corridor
- Gen-Tie Corridor

Proposed Gen-Tie
- Option 1
- Option 2
- Option 3
- Option 4
- Option 5

- 20-mile Protected Areas Buffer
- POI: PacifiCorp Apex
- POI: PGE Grassland
- County Boundary
- State Boundary
- City/Town
- Interstate Highway
- US Highway
- State Highway
- Boardman Bombing Range

- Fish Hatchery

Protected Areas
- Area of Critical Environmental Concern (BLM)
- Research Natural Area (BLM)
- State Park or State Scenic Corridor (OPRD)
- State Wildlife Refuge or Management Area (ODFW)
- Wild, Scenic, or Recreational River (BLM)
- National Wildlife Refuge (USFWS)
- Oregon Natural Area (TNC)
- State Scenic Waterway (ORPD)

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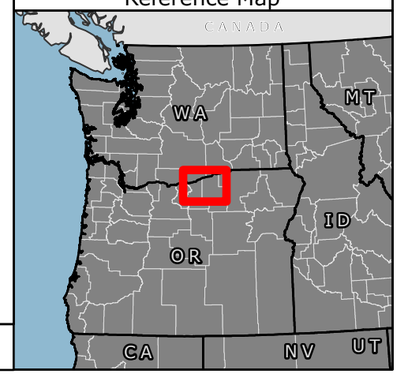
Reference Map



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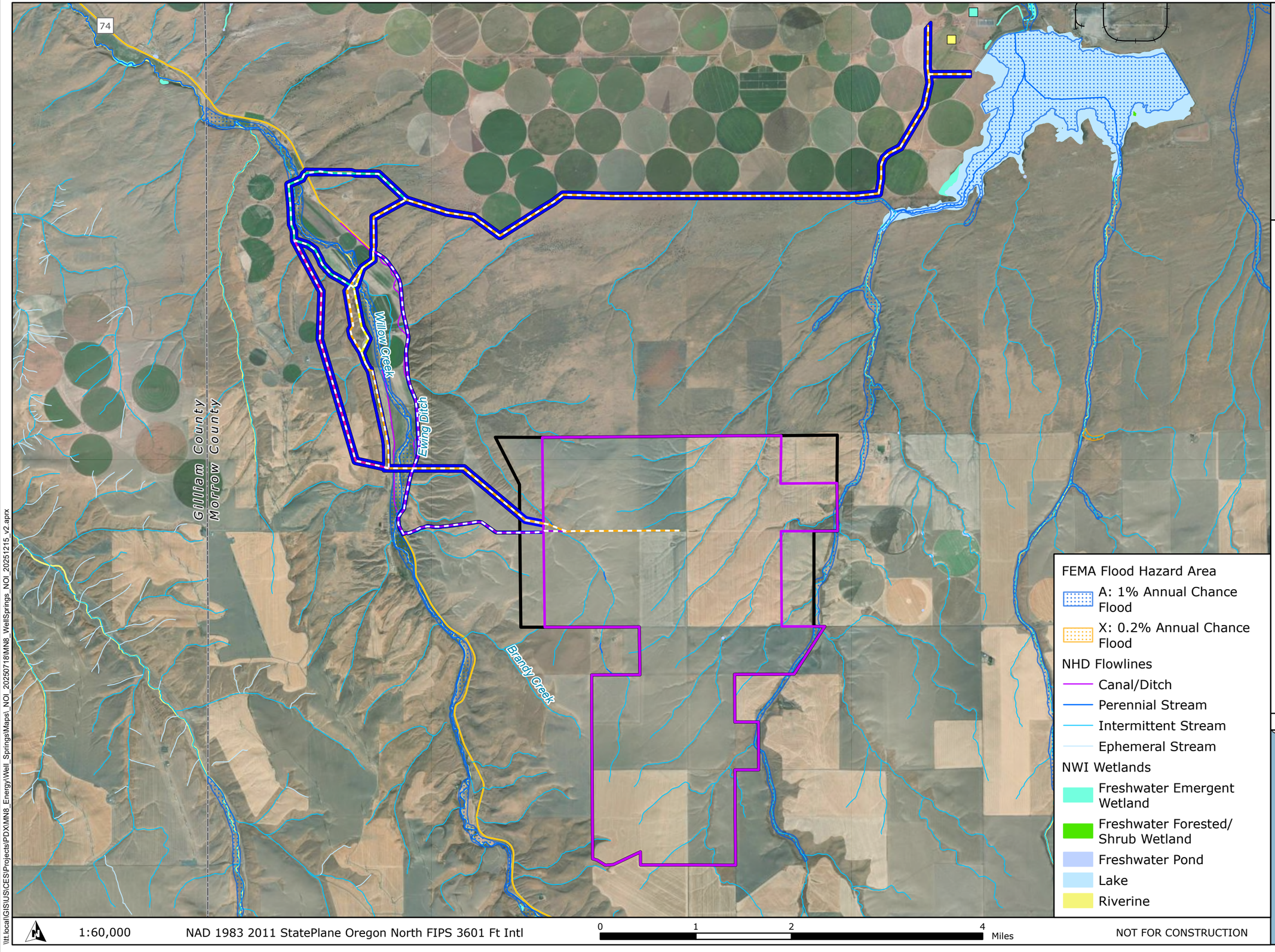
Well Springs Solar Project

Figure 7
Wetlands, Waters, and Flood Hazards

MORROW COUNTY, OR



- Facility Site Boundary
- Micrositing Corridor
- Gen-Tie Corridor

Proposed Gen-Tie
- Option 1
- Option 2
- Option 3
- Option 4
- Option 5
- POI: PAC Apex
- POI: PGE Grassland
- County Boundary
- State Highway
- Railroad

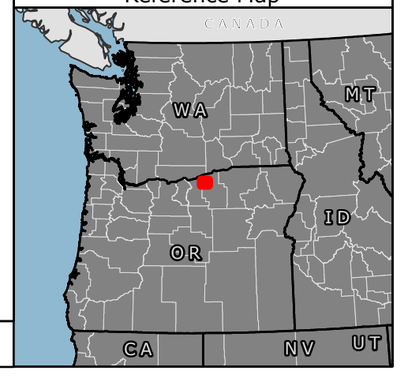
FEMA Flood Hazard Area
- A: 1% Annual Chance Flood
- X: 0.2% Annual Chance Flood

NHD Flowlines
- Canal/Ditch
- Perennial Stream
- Intermittent Stream
- Ephemeral Stream

NWI Wetlands
- Freshwater Emergent Wetland
- Freshwater Forested/ Shrub Wetland
- Freshwater Pond
- Lake
- Riverine

TETRA TECH

Reference Map



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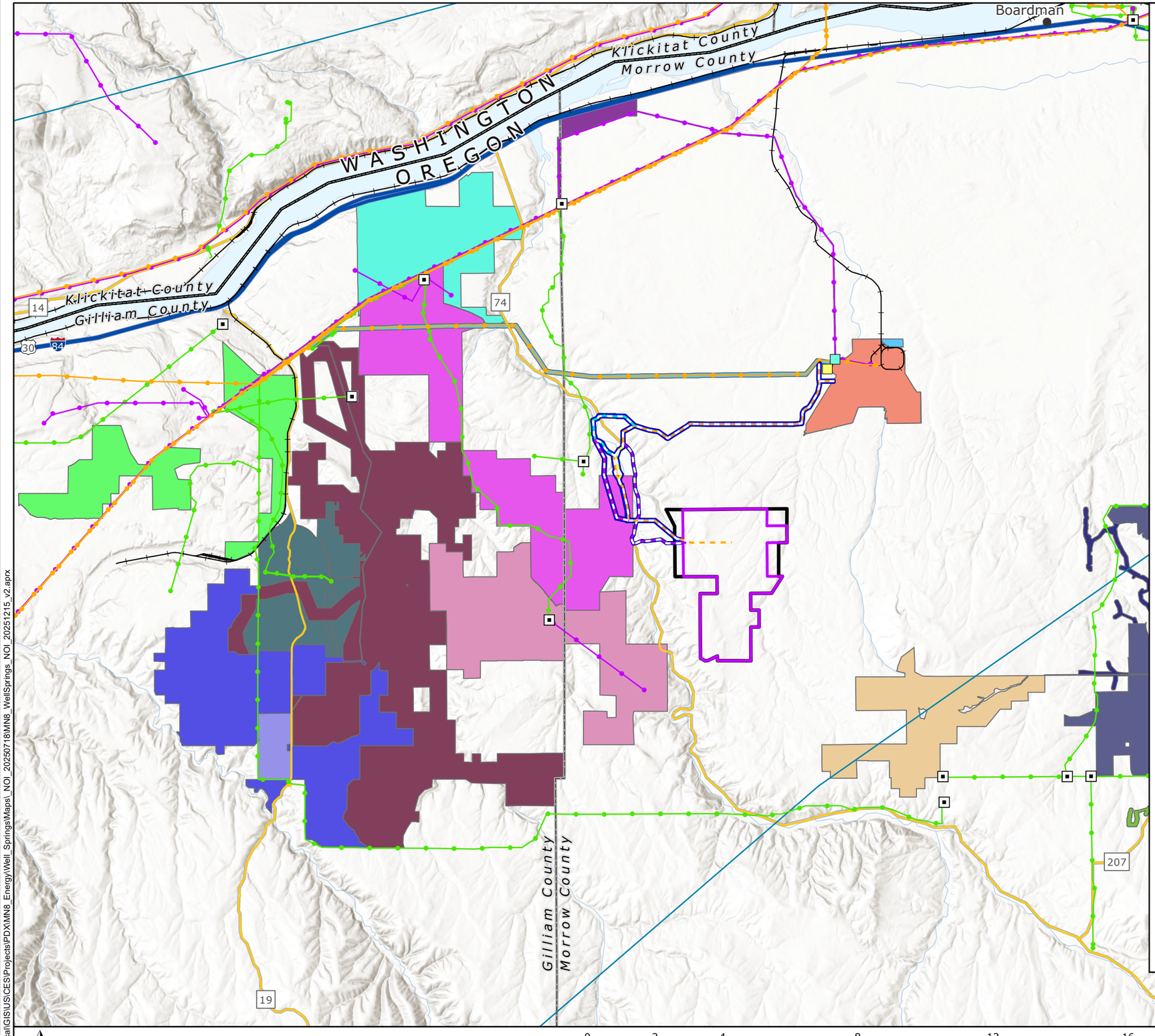
Well Springs Solar Project

Figure 8
Energy Facilities

MORROW COUNTY, OR



Exisiting Energy Facilities

- Boardman Coal Plant, Decommissioned
- Boardman Solar Energy Facility, Approved
- Carty Generating Station pRFA4, Proposed
- Carty Generating Station, Approved
- Coyote Springs Cogeneration, Operating
- Leaning Juniper IIA Wind Power Facility, Operating; Repowering Under Construction
- Leaning Juniper IIB Wind Power Facility, Operating
- Montague Solar (Pachwáywit Fields), Operating
- Montague Wind, Operating
- Oregon Trail Solar, Approved/ Under Construction
- Shepherds Flat Central, Operating/Under Construction
- Shepherds Flat North, Operating/Under Construction
- Shepherds Flat South, Operating/Under Construction
- Sunrise Solar and Storage Projects, Proposed
- Sunstone Solar Project, Approved
- Wagon Trail Solar Project, Approved
- Wheatridge Renewable Energy Facility East, Approved
- Wheatridge Renewable Energy Facility I, Operating
- Wheatridge Renewable Energy Facility II, Operating
- Wheatridge Renewable Energy Facility III, Operating

Transmission Lines

- 115 kV Transmission Line
- 230 kV Transmission Line
- 500 kV Transmission Line

- Facility Site Boundary
- Micrositing Corridor
- Gen-Tie Corridor

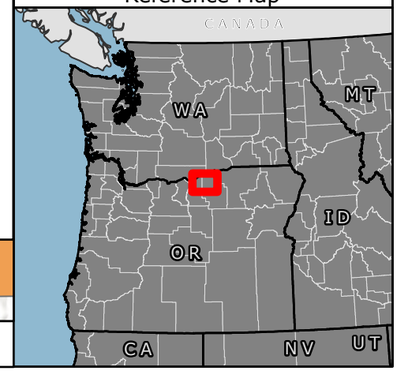
Proposed Gen-Tie

- Option 1
- Option 2
- Option 3
- Option 4
- Option 5
- POI: PacifiCorp Apex
- POI: PGE Grassland
- County Boundary
- State Boundary
- City/Town
- Interstate Highway
- US Highway
- State Highway
- Railroad
- Natural Gas Pipeline
- Substation

TETRA TECH

MN

Reference Map



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Attachment 1. Articles of Organization

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APPLICATION FOR AUTHORITY

Corporation Division
sos.oregon.gov/business

E-FILED
Aug 06, 2025
OREGON SECRETARY OF STATE

REGISTRY NUMBER

245008297

TYPE

FOREIGN LIMITED LIABILITY COMPANY

1. ENTITY NAME

WELL SPRINGS SOLAR LLC

2. MAILING ADDRESS

1155 AVENUE OF THE AMERICAS FL 27
C/O MN8 ENERGY LLC
NEW YORK NY 10036 USA

3. NAME & ADDRESS OF REGISTERED AGENT

15872088 - CORPORATION SERVICE COMPANY

1127 BROADWAY ST NE STE 310
SALEM OR 97301 USA

4. MANAGEMENT

This Limited Liability Company will be manager-managed by one or more managers

5. DATE OF ORGANIZATION

08-04-2025

6. DURATION

PERPETUAL

7. JURISDICTION

DE

8. PRIMARY PHYSICAL LOCATION

1155 AVENUE OF THE AMERICAS FL 27
C/O MN8 ENERGY LLC
NEW YORK NY 10036 USA

I declare, under penalty of perjury, that this document does not fraudulently conceal, fraudulently obscure, fraudulently alter or otherwise misrepresent the identity of the person or any officers, managers, members or agents of the limited liability company on behalf of which the person signs. This filing has been examined by me and is, to the best of my knowledge and belief, true, correct, and complete. Making false statements in this document is against the law and may be penalized by fines, imprisonment, or both.

By typing my name in the electronic signature field, I am agreeing to conduct business electronically with the State of Oregon. I understand that transactions and/or signatures in records may not be denied legal effect solely because they are conducted, executed, or prepared in electronic form and that if a law requires a record or signature to be in writing, an electronic record or signature satisfies that requirement.

ELECTRONIC SIGNATURE

NAME

ASHLEE J. B. EFFLER

TITLE

AUTHORIZED SIGNATORY

DATE

08-05-2025

Delaware

The First State

I, CHARUNI PATIBANDA-SANCHEZ, 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 "WELL SPRINGS SOLAR LLC", FILED IN THIS OFFICE ON THE FOURTH DAY OF AUGUST, A.D. 2025, AT 9:31 O`CLOCK A.M.

Charuni Patibanda-Sanchez, Secretary of State

10282482 8100
SR# 20253555198

Authentication: 204382428
Date: 08-04-25

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

CERTIFICATE OF FORMATION
OF
WELL SPRINGS SOLAR LLC

This Certificate of Formation is filed pursuant to Section 18-201 of the Delaware Limited Liability Act (the "***Act***") to form a limited liability company under the Act.

1. The name of the limited liability company is Well Springs Solar LLC (the "***Company***").

2. The address of the Company's registered office in the State of Delaware is:

Corporation Service Company
251 Little Falls Drive,
Wilmington, New Castle County, Delaware 19808

3. The name and address of the registered agent for service of process on the Company in the State of Delaware are:

Corporation Service Company
251 Little Falls Drive,
Wilmington, New Castle County, Delaware 19808

IN WITNESS WHEREOF, this Certificate of Formation has been executed on August 4, 2025, by the undersigned organizer.

By: _____
Name: Ashlee J. B. Effler
Title: Authorized Person

State of Delaware
Secretary of State
Division of Corporations
Delivered 09:31 AM 08/04/2025
FILED 09:31 AM 08/04/2025
SR 20253555198 - File Number 10282482

Attachment 2. Tax Lots and Property Owner Information

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Notice of Intent to Apply for a Site Certificate for the Well Springs Solar Project

Property Owner List and Tax Lot Map - Morrow County (12/16/2025), Gilliam County (12/17/2025)

Map Tax Lot	Owner	Additional Owner	Address	City	State	Zip Code	County
04N24E000000121	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
04N23E000000110	BEEF NORTHWEST BOARDMAN, INC		PO BOX 209	NORTH POWDER	OR	97867	Morrow
04N23E000000110	BEEF NORTHWEST FEEDERS, LLC		PO BOX 209	NORTH POWDER	OR	97867	Morrow
04N23E000000110	NORTHWEST PASTURE BEEF, LLC	BEEF NORTHWEST FEEDERS	PO BOX 209	NORTH POWDER	OR	97867	Morrow
04N23E000000110	OFFUTT, R D, COMPANY		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
04N23E000000110	R D OFFUTT COMPANY		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
04N23E000000110	SIMTAG FARMS	THREEMILE CANYON FARMS, LLC	75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
04N23E000000110	TAGGARES FARMS, INC	THREEMILE CANYON FARMS, LLC	75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
04N23E000000110	Threemile Canyon Farms LLC		75906 Marty Myers RD	BOARDMAN	OR	97818	Morrow
04N23E000000110	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
04N25E000001600	USA (DEPT OF NAVY)	ATTN: RANGE MANAGEMENT, N00RM	3730 N CHARLES PORTER AVE	OAK HARBOR	WA	98278	Morrow
03N23E000000111	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
03N23E000000100	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
03N23E000000100	OFFUTT, R D, COMPANY		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
03N23E000000100	COLUMBIA RIVER DAIRY	THREEMILE CANYON FARMS, LLC	75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
03N23E000000100	OFFUTT, R D, COMPANY		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
03N23E000000100	COMMERCIAL EQUIPMENT LEASE	BEEF NORTHWEST BOARDMAN, INC	66407 TAGGARES LN	BOARDMAN	OR	97818	Morrow
03N24E000000117	PORTLAND GENERAL ELECTRIC COMPANY ETAL	CORPORATE TAX DEPARTMENT	121 SW SALMON ST	PORTLAND	OR	97204	Morrow
03N24E000000102	PORTLAND GENERAL ELECTRIC COMPANY ETAL	CORPORATE TAX DEPARTMENT	121 SW SALMON ST	PORTLAND	OR	97204	Morrow
03N24E000000113	PORTLAND GENERAL ELECTRIC	CORPORATE TAX DEPARTMENT	121 SW SALMON ST	PORTLAND	OR	97204	Morrow
03N24E000000120	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
03N24E000000112	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
03N25E000000100	USA (BOMBING RANGE)					0	Morrow
02N23E000003701	ART MINOR PROPERTY, LLC		68171 KUNZE LN	BOARDMAN	OR	97818	Morrow
02N23E000003900	MILLER, APRIL, 1/2 & MILLER, LORI, 1/2	C/O PDS TAX SERVICES	777 TAYLOR ST 1A	FORT WORTH	TX	76102	Morrow
02N23E000003700	ART MINOR PROPERTY, LLC		68171 KUNZE LN	BOARDMAN	OR	97818	Morrow
02N23E000004200	MILLER, APRIL, 1/2 & MILLER, LORI, 1/2	C/O PDS TAX SERVICES	777 TAYLOR ST 1A	FORT WORTH	TX	76102	Morrow
02N23E000002300	ART MINOR PROPERTY, LLC		68171 KUNZE LN	BOARDMAN	OR	97818	Morrow
02N23E000003500	HEIDEMAN, LOREN A, TRUSTEE ETAL		22948 FAIRVIEW LN	IONE	OR	97843	Morrow
02N23E000003500	HEIDEMAN, LOREN A ETAL	PROPERTY TAX DEPT	125 E JEFFERSON ST	SYRACUE	NY	13202	Morrow
02N23E000003200	ART MINOR PROPERTY, LLC		68171 KUNZE LN	BOARDMAN	OR	97818	Morrow
02N23E000003100	STATE OF OREGON		417 TRANSPORTATION BLDG	SALEM	OR	97310	Morrow
02N23E000002301	MILLER, APRIL, 1/2 & MILLER, LORI, 1/2	C/O PDS TAX SERVICES	777 TAYLOR ST 1A	FORT WORTH	TX	76102	Morrow
02N23E000003000	MILLER, APRIL, 1/2 & MILLER, LORI, 1/2	C/O PDS TAX SERVICES	777 TAYLOR ST 1A	FORT WORTH	TX	76102	Morrow
02N23E000000102	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
02N23E000002400	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000003501	JANSEN, VIC		PO BOX 579	MOSES LAKE	WA	98837	Morrow
02N23E000003501	SADDLE BUTTE WIND, LLC	PROPERTY TAX DEPT	125 E JEFFERSON ST	SYRACUSE	NY	13202	Morrow
02N23E000001600	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000001604	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000002200	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000002201	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000001602	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000001400	EUBANKS, ADAM		71533 HWY 74	IONE	OR	97843	Morrow
02N23E000001402	EUBANKS, ADAM		71533 HWY 74	IONE	OR	97843	Morrow
02N23E000002100	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000002101	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000001401	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000001605	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000001200	PERRY, DANIEL L & JEFFRIES, BETSY		72097 HIGHWAY 74	IONE	OR	97843	Morrow

Notice of Intent to Apply for a Site Certificate for the Well Springs Solar Project

Property Owner List and Tax Lot Map - Morrow County (12/16/2025), Gilliam County (12/17/2025)

Map Tax Lot	Owner	Additional Owner	Address	City	State	Zip Code	County
02N23E000001202	PERRY, DANIEL L & JEFFRIES, BETSY		72097 HWY 74	IONE	OR	97843	Morrow
02N23E000001100	STATE OF OREGON		417 TRANSPORTATION BLDG	SALEM	OR	97310	Morrow
02N23E000001201	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000001300	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000001000	EATON, MICHAEL & SHERRY		72396 HWY 74	IONE	OR	97843	Morrow
02N23E000000900	DUELING J'S LIGHTNING BAR, LLC	JANETTE BURGESS	72512 HIGHWAY 74	IONE	OR	97843	Morrow
02N23E000000700	STRZELEWICZ, KURTIS C		72782 HWY 74	IONE	OR	97843	Morrow
02N23E000004400	MORROW COUNTY		PO BOX 788	HEPPNER	OR	97836	Morrow
02N23E000000100	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
03N24E000000100	INSITU INC	PWC US TAX LLP	PO BOX 30026	TAMPA	FL	33630	Morrow
02N23E000001603	CAL HOLDINGS, LLC	AMBROSE CALCAGNO	17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Morrow
02N23E000002900	MILLER, APRIL, 1/2 & MILLER, LORI, 1/2	C/O PDS TAX SERVICES	777 TAYLOR ST 1A	FORT WORTH	TX	76102	Morrow
02N23E000001001	TAYLOR, RODERICK H & TAYLOR, GLENDA S		72447 HWY 74	IONE	OR	97843	Morrow
03N24E000000122	PORTLAND GENERAL ELECTRIC	CORPORATE TAX DEPARTMENT	121 SW SALMON ST	PORTLAND	OR	97204	Morrow
03N24E000000121	PORTLAND GENERAL ELECTRIC	CORPORATE TAX DEPARTMENT	121 SW SALMON ST	PORTLAND	OR	97204	Morrow
03N24E000000114	PORTLAND GENERAL ELECTRIC COMPANY ETAL	CORPORATE TAX DEPARTMENT	121 SW SALMON ST	PORTLAND	OR	97204	Morrow
03N24E000000114	BOARDMAN RURAL FIRE PROTECTION DISTRICT		300 SW WILSON LN	BOARDMAN	OR	97818	Morrow
02N24E000001500	MILLER, APRIL, 1/2 & MILLER, LORI, 1/2	C/O PDS TAX SERVICES	777 TAYLOR ST 1A	FORT WORTH	TX	76102	Morrow
02N24E000001400	IMMIGRANT LANE, LLC		64982 BAKER LN	IONE	OR	97843	Morrow
02N24E000001300	NUFERROUS, CATHERINE M		65444 IMMIGRANT LN	IONE	OR	97843	Morrow
02N24E000001100	HOLTZ, TIM & HOLTZ, DEBBIE		65151 TEWS LN	IONE	OR	97843	Morrow
02N24E000000600	CRAWFORD, KYLE ET AL		5645 HWY 201	ONTARIO	OR	97914	Morrow
02N24E000000300	KLINGER, KENNETH MICHAEL		68280 IMMIGRANT LN	IONE	OR	97843	Morrow
02N24E000000302	PECK, MARILYN & MORGAN, GARY		1042 NW 12TH ST APT C	PENDLETON	OR	97801	Morrow
02N24E000000200	ELLA RANCH, LLC	DOHERTY, RICHARD	3588 NW LEHMAN PL	BEAVERTON	OR	97006	Morrow
02N24E000000102	PORTLAND GENERAL ELECTRIC	CORPORATE TAX DEPARTMENT	121 SW SALMON ST	PORTLAND	OR	97204	Morrow
02N24E000000105	PORTLAND GENERAL ELECTRIC COMPANY ETAL	CORPORATE TAX DEPARTMENT	121 SW SALMON ST	PORTLAND	OR	97204	Morrow
02N24E000000100	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
02N24E000000101	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
02N24E000000107	THREEMILE CANYON FARMS, LLC		75906 MARTY MYERS RD	BOARDMAN	OR	97818	Morrow
02N24E000000103	PORTLAND GENERAL ELECTRIC	CORPORATE TAX DEPARTMENT	121 SW SALMON ST	PORTLAND	OR	97204	Morrow
02N24E000000700	ELLA RANCH, LLC	DOHERTY, RICHARD	3588 NW LEHMAN PL	BEAVERTON	OR	97006	Morrow
02N23E000004300	MILLER, APRIL, 1/2 & MILLER, LORI, 1/2	C/O PDS TAX SERVICES	777 TAYLOR ST 1A	FORT WORTH	TX	76102	Morrow
02N23E000004000	MILLER, APRIL, 1/2 & MILLER, LORI, 1/2	C/O PDS TAX SERVICES	777 TAYLOR ST 1A	FORT WORTH	TX	76102	Morrow
02N23E000004000	MILLER, PAUL	MILLER-LEPAGE, APRIL	770 GLEN CREEK RD NW	SALEM	OR	97304	Morrow
02N23E000004100	MILLER, APRIL, 1/2 & MILLER, LORI, 1/2	C/O PDS TAX SERVICES	777 TAYLOR ST 1A	FORT WORTH	TX	76102	Morrow
02N24E000001200	MORTER, RALPH L		66221 DIRT RD	IONE	OR	97843	Morrow
02N24E000001201	MORTER, RALPH		66221 DIRT RD	IONE	OR	97843	Morrow
02N25E000000701	ELLA RANCH, LLC	DOHERTY, RICHARD	3588 NW LEHMAN PL	BEAVERTON	OR	97006	Morrow
02N25E000000200	USA (BOMBING RANGE)					0	Morrow
02N24E000000106	PORTLAND GENERAL ELECTRIC	CORPORATE TAX DEPARTMENT	121 SW SALMON ST	PORTLAND	OR	97204	Morrow
01N23E000005100	IONE-LEXINGTON CEMETERY MAINTENANCE DIST					0	Morrow
01N23E000004900	TURNER, JENNIFER & RICKY		68498 HWY 74	IONE	OR	97843	Morrow
01N23E22A001002	SULLIVAN, J P		PO BOX 205	DURKEE	OR	97905	Morrow
01N23E22A001000	SULLIVAN, J P		PO BOX 205	DURKEE	OR	97905	Morrow
01N23E22A001003	SULLIVAN, J P		PO BOX 205	DURKEE	OR	97905	Morrow
01N23E22A001001	TURNER, JENNIFER & RICKY		68498 HWY 74	IONE	OR	97843	Morrow
01N23E22A000400	TURNER, JENNIFER & RICKY		68498 HWY 74	IONE	OR	97843	Morrow
01N23E000002902	GALBREATH, DANIEL SCOTT ET AL		67505 HIGHWAY 74	IONE	OR	97843	Morrow
01N23E000007404	BAR PLUS SEVEN CATTLE COMPANY, LLC		68498 HWY 74	IONE	OR	97843	Morrow

Notice of Intent to Apply for a Site Certificate for the Well Springs Solar Project

Property Owner List and Tax Lot Map - Morrow County (12/16/2025), Gilliam County (12/17/2025)

Map Tax Lot	Owner	Additional Owner	Address	City	State	Zip Code	County
01N23E000002901	BAR PLUS SEVEN CATTLE COMPANY, LLC		68498 HWY 74	IONE	OR	97843	Morrow
01N23E000002800	CROWELL, HOWARD EUGENE, JR & KRISTY JO		68104 HWY 74	IONE	OR	97843	Morrow
01N23E000002300	BRIDSTON, CHRISTINA		8020 57TH ST W	UNIVERSITY PLACE	WA	98467	Morrow
01N23E000000900	HEIDEMAN, LOREN A, TRUSTEE ETAL		22948 FAIRVIEW LN	IONE	OR	97843	Morrow
01N23E000000900	HEIDEMAN, LOREN A ETAL	PROPERTY TAX DEPT	125 E JEFFERSON ST	SYRACUE	NY	13202	Morrow
01N23E000001601	TURNER, JENNIFER & RICKY		68498 HWY 74	IONE	OR	97843	Morrow
01N23E000002200	BRIDSTON, CHRISTINA J		8020 57TH ST W	TACOMA	WA	98467	Morrow
01N23E000000401	TWO R FARM, INC		70338 RIETMANN LN	IONE	OR	97843	Morrow
01N23E000002100	TWO R FARM, INC		70338 RIETMANN LN	IONE	OR	97843	Morrow
01N23E000001800	PROUDFOOT, PAUL, PRESIDENT	PROUDFOOT RANCHES, INC	69849 PROUDFOOT RD	IONE	OR	97843	Morrow
01N23E000002000	RYE RIDGE LLC		70595 DAVE RIETMANN RD	IONE	OR	97843	Morrow
01N23E000000200	PROUDFOOT RANCHES, INC		69849 PROUDFOOT RD	IONE	OR	97843	Morrow
01N23E000000201	RYE RIDGE LLC		70595 DAVE RIETMANN RD	IONE	OR	97843	Morrow
01N23E000000400	RYE RIDGE LLC		70595 DAVE RIETMANN RD	IONE	OR	97843	Morrow
01N23E000000500	NELSON, BARBARA A 1/2 ETAL		72521 TUTUILLA CREEK RD	PENDLETON	OR	97801	Morrow
01N23E000000300	PROUDFOOT RANCHES, INC		69849 PROUDFOOT RD	IONE	OR	97843	Morrow
01N23E000000101	MILLER, JUSTIN C & MILLER, NICOLE MARIE		65096 BAKER LN	IONE	OR	97843	Morrow
01N23E000000100	MILLER, APRIL, 1/2 & MILLER, LORI, 1/2	C/O PDS TAX SERVICES	777 TAYLOR ST 1A	FORT WORTH	TX	76102	Morrow
01N23E000000100	MILLER, NANCY L		64982 BAKER LN	IONE	OR	97843	Morrow
01N23E000000800	ART MINOR PROPERTY, LLC		68171 KUNZE LN	BOARDMAN	OR	97818	Morrow
01N23E000002400	TURNER, JENNIFER & RICKY		68498 HWY 74	IONE	OR	97843	Morrow
01N23E000002600	TURNER, JENNIFER & RICKY		68498 HWY 74	IONE	OR	97843	Morrow
01N23E000002700	TURNER, JENNIFER & RICKY		68498 HWY 74	IONE	OR	97843	Morrow
01N23E000002601	TWO R FARM, INC		70338 RIETMANN LN	IONE	OR	97843	Morrow
01N23E000002500	TWO R FARM, INC		70338 RIETMANN LN	IONE	OR	97843	Morrow
01N23E000002001	TWO R FARM, INC		70338 RIETMANN LN	IONE	OR	97843	Morrow
01N24E000001003	BRIDSTON, CHRISTINA J		8020 57TH ST W	TACOMA	WA	98467	Morrow
01N24E000001000	PROUDFOOT RANCHES, INC		69849 PROUDFOOT RD	IONE	OR	97843	Morrow
01N24E000001100	LINDSTROM, ELIZABETH K		6412 N 31ST ST	TACOMA	WA	98407	Morrow
01N24E000000900	ELLA BUTTE LLC		70595 DAVE RIETMANN RD	IONE	OR	97843	Morrow
01N24E000000800	ELLA BUTTE LLC		70595 DAVE RIETMANN RD	IONE	OR	97843	Morrow
01N24E000000700	ELLA BUTTE LLC		70595 DAVE RIETMANN RD	IONE	OR	97843	Morrow
01N23E000005200	PROUDFOOT RANCHES, INC ETAL		69849 PROUDFOOT RD	IONE	OR	97843	Morrow
01N23E000004800	TURNER, JENNIFER & RICKY		68498 HWY 74	IONE	OR	97843	Morrow
01N23E22A000200	SULLIVAN, J P		PO BOX 205	DURKEE	OR	97905	Morrow
01N23E22A000100	STATE OF OREGON		417 TRANSPORTATION BLDG	SALEM	OR	97310	Morrow
01N23E22A000201	PROUDFOOT RANCHES, INC		69849 PROUDFOOT RD	IONE	OR	97843	Morrow
02N24E000000701	ELLA RANCH, LLC	DOHERTY, RICHARD	3588 NW LEHMAN PL	BEAVERTON	OR	97006	Morrow
03N24E000000123	ROWAN PERCHERON LLC	BIRCH INFRASTRUCTURE	120 STATE ST STE 120	TRAVERSE CITY	MI	49684	Morrow
03N22E0000-02100	THREEMILE CANYON FARMS LLC		75906 THREEMILE RD	BOARDMAN	OR	97818	Gilliam
02N22E0000-01301	JANSEN VIC		PO BOX 579	MOSES LAKE	WA	98837	Gilliam
02N22E0000-01300	HEIDEMAN DEACON J & ERIN E		22946 FAIRVIEW LN	IONE	OR	97843	Gilliam
02N22E0000-00100	KREBS KIP H & SARAH M		75398 HWY 74	IONE	OR	97843	Gilliam
02N22E0000-02000	JANSEN VIC		PO BOX 579	MOSES LAKE	WA	98837	Gilliam
02N22E0000-01900	CAL HOLDINGS LLC		17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Gilliam
02N22E0000-01200	CAL HOLDINGS LLC		17251 S CLACKAMAS RIVER DR	OREGON CITY	OR	97045	Gilliam

Well Springs Solar Project

Attachment 2
Figure 1
Taxlots

MORROW COUNTY, OR

Figure 1.1

Figure 1.2

Figure 1.3

Figure 1.4

Gilliam County

Morrow County

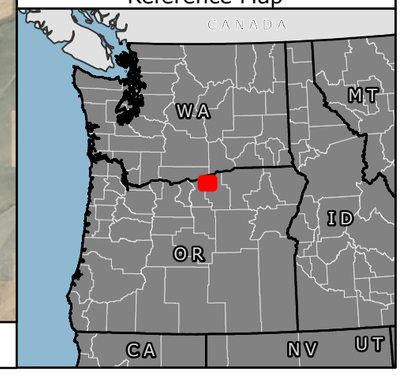
- Map Grid
- Facility Site Boundary
- County Boundary
- Morrow County Taxlot Boundary[1]
- Gilliam County Taxlot Boundary[2]

[1]Data obtained from Morrow County on 12/16/2025
[2]Data obtained from Gilliam County on 12/17/2025

TETRA TECH

MN8

Reference Map



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NAD 1983 2011 StatePlane Oregon North FIPS 3601 Ft Intl

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NOT FOR CONSTRUCTION

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Well Springs Solar Project

Attachment 2
Figure 1.1
Taxlots

MORROW COUNTY, OR

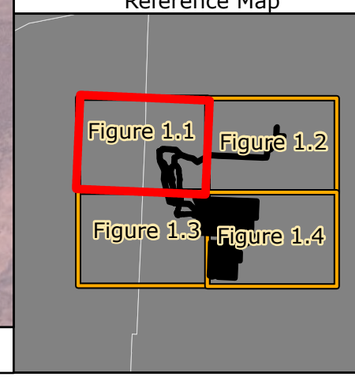
- Facility Site Boundary
- County Boundary
- Morrow County Taxlot Boundary[1]
- Gilliam County Taxlot Boundary[2]

[1]Data obtained from Morrow County on 12/16/2025
[2]Data obtained from Gilliam County on 12/17/2025

TETRA TECH

MN

Reference Map



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Gilliam County
Morrow County
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NAD 1983 2011 StatePlane Oregon North FIPS 3601 Ft Intl

0 1 2 Miles

NOT FOR CONSTRUCTION

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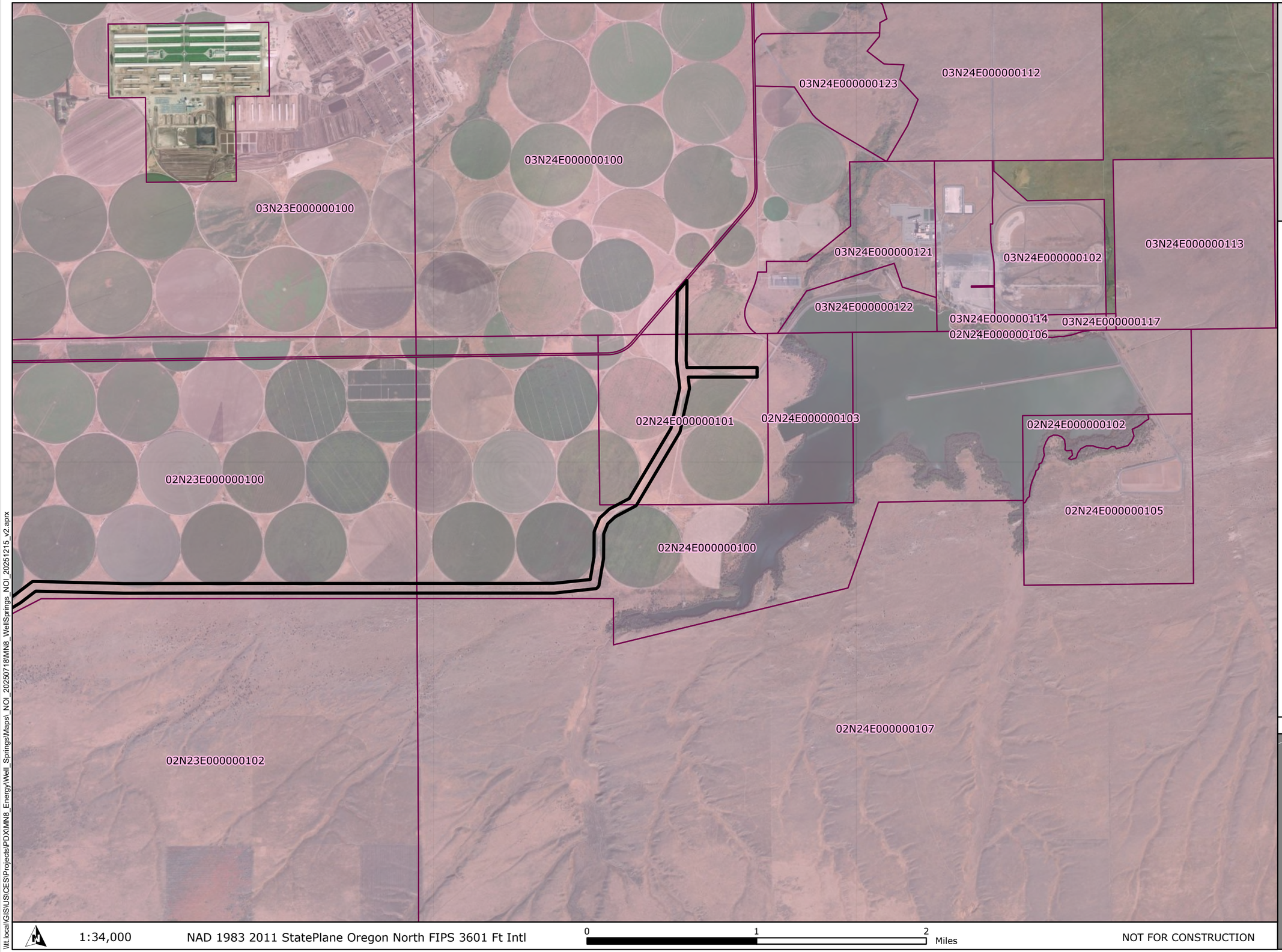
Well Springs Solar Project

Attachment 2
Figure 1.2
Taxlots

MORROW COUNTY, OR



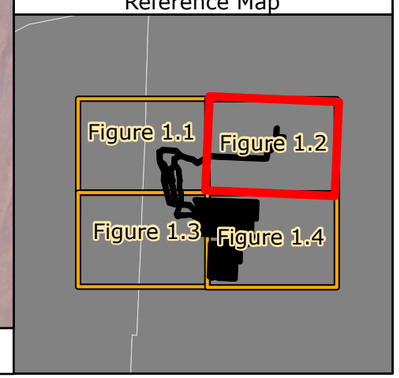
- Facility Site Boundary
- County Boundary
- Morrow County Taxlot Boundary[1]
- Gilliam County Taxlot Boundary[2]

[1]Data obtained from Morrow County on 12/16/2025
[2]Data obtained from Gilliam County on 12/17/2025

TETRA TECH

MN:

Reference Map



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NAD 1983 2011 StatePlane Oregon North FIPS 3601 Ft Intl

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Well Springs Solar Project

Attachment 2
Figure 1.3
Taxlots

MORROW COUNTY, OR

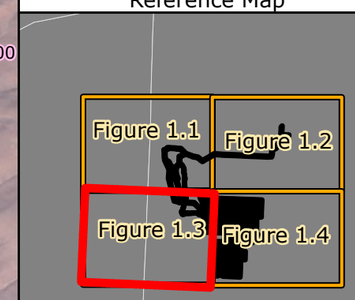
- Facility Site Boundary
- County Boundary
- Morrow County Taxlot Boundary[1]
- Gilliam County Taxlot Boundary[2]

[1]Data obtained from Morrow County on 12/16/2025
[2]Data obtained from Gilliam County on 12/17/2025

TETRA TECH

MN8

Reference Map



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Gilliam County
Morrow County

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NAD 1983 2011 StatePlane Oregon North FIPS 3601 Ft Intl

0 1 2 Miles

NOT FOR CONSTRUCTION

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Well Springs Solar Project

Attachment 2
Figure 1.4
Taxlots

MORROW COUNTY, OR

- Facility Site Boundary
- County Boundary
- Morrow County Taxlot Boundary[1]
- Gilliam County Taxlot Boundary[2]

[1]Data obtained from Morrow County on 12/16/2025
[2]Data obtained from Gilliam County on 12/17/2025

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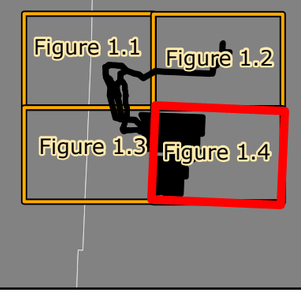
Reference Map



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Attachment 3. Correspondence with Legislative Commission on Indian Services

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From:	Bullion Elissa
To:	Gulick, Kristen
Cc:	Konkol, Carrie
Subject:	RE: Area Tribal Contacts for the Proposed Well Springs Solar Project, Morrow County, Oregon
Date:	Tuesday, July 29, 2025 3:14:37 PM
Attachments:	image007.png image008.png image009.png image010.png image011.png

Good afternoon Kristen,

Thank you for reaching out to our office. For this project location in Morrow 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) . Please let me know if you have any further 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: Gulick, Kristen <Kristen.Gulick@tetratech.com>
Sent: Thursday, July 24, 2025 12:35 PM
To: LCIS <LCIS@oregonlegislature.gov>
Cc: Konkol, Carrie <Carrie.Konkol@tetratech.com>
Subject: Area Tribal Contacts for the Proposed Well Springs Solar Project, Morrow County, Oregon

Good afternoon/morning,

We are working with a client exploring the development of a photovoltaic (PV) solar power generation project in Morrow County, Oregon. The proposed 750-megawatt Well Springs Solar Project is located on approximately 5,600 contiguous acres east of Cecil and OR-74. See the attached preliminary figure of the site vicinity. The project proponent will conduct cultural resource file searches through the State Historic Preservation Office (SHPO) and field surveys within the proposed project area.

We are seeking your assistance in identifying the appropriate tribal contacts to consult with regarding tribal historic and cultural resources in the vicinity of this proposed project area.

Thank you very much for your time.

Regards,

Kristen Gulick, MS (she/her) | Senior Associate Environmental Scientist/Planner | Tetra Tech
Mobile (**541) 740-3316** | kristen.gulick@tetratech.com