

Preliminary Application for Site Certificate for the Speedway Energy Facility

Exhibit O. State and Local Laws and Regulations

Part 2. Water Use

**Submitted to
Oregon Energy Facility Siting Council**

Prepared for



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Prepared by



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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
Applicant	BGTF Speedway Project LLC
BPA	Bonneville Power Administration
Facility	Speedway Energy Facility
Mgal	million gallons
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ORS	Oregon Revised Statutes

1.0 Introduction

BGTF Speedway Project LLC (Applicant) proposes construction and operation of the Speedway Energy Facility (Facility), a renewable energy facility incorporating wind, solar, and battery energy storage, located on privately owned land in unincorporated Sherman County, Oregon. The Facility's proposed point of interconnection to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt Ashe-Marion Transmission Line, which runs northeast/southwest through the site boundary.

The information contained herein supports demonstration of compliance with the State and Local Laws and Regulations approval standard for Oregon Administrative Rules (OAR) 345-022-00160.

2.0 Description of Water Use – OAR 345-022-0160(1)(b)(A)

(b) Information about anticipated water use during construction and operation of the proposed facility. The applicant must include:

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

2.1 Construction

During construction, the Facility will require an anticipated conservative maximum of 383.5 million gallons (Mgal) of water (Table O2-1). The primary water uses during construction are mixing concrete for foundations, road construction, and dust control. Water trucks will be used to control dust generation in disturbed areas during road construction, foundation installation, installation of Facility components, and site restoration. Fire prevention represents a minor water use and would involve stationing a water truck at the job site to keep the ground and vegetation moist as specified in the Draft Construction Wildfire Mitigation Plan (Exhibit M – Wildfire Prevention and Risk Management, Attachment M-1).

Table O2-1. Water Use During Construction

Construction Use	Quantity
Site dust control	288.2 Mgal
Vehicle wash stations and turbine washing	5.7 Mgal
Road compaction/earthwork	23.3 Mgal
Drinking water/sanitation	6.0 Mgal
Concrete mixing (total)	60.3 Mgal
• Turbine tower foundations	27.2 Mgal
• Tracker post foundations	9.2 Mgal
• Battery pad foundations	1.2 Mgal

Construction Use	Quantity
• <i>Inverter/transformer pad foundations</i>	<i>22.2 Mgal</i>
• <i>Transmission line post foundations</i>	<i>10,000 gallons</i>
• <i>Substation foundations</i>	<i>0.5 Mgal</i>
• <i>O&M building foundations</i>	<i>20,000 gallons</i>
Total	383.5 Mgal

For the construction of foundations, water will be transported to concrete batch plant sites within the site boundary where it will be used to mix wet concrete. From the batch plant, the wet concrete will be transported to the construction sites in concrete trucks for use in foundation installation. The Applicant will implement dust control measures at areas disturbed by construction activities in a manner that is consistent with the best management practices presented in the Applicant's Erosion and Sediment Control Plan (Exhibit C – Soil Protection, Attachment C-1) and 1200-C Construction Stormwater National Pollutant Discharge Elimination System Permit.

During construction, equipment will cut, move, and compact the subgrade surface, stockpile soils for later use, decompact soils as needed, and perform final grading for site revegetation. Water trucks will patrol the site to control dust, periodically wetting down disturbed and exposed soils; the frequency of truck passes will depend on weather conditions. Once soil disturbance from site preparation is complete, dust control needs become minimal. Water is not anticipated to be needed for site revegetation, which would instead rely on natural precipitation and native seed types that are adapted to the rainfall regime of the region.

2.2 Operation

During operation, the Facility will require water use in the operations and maintenance (O&M) buildings. Water will be provided by an on-site well or obtained in bulk from one of the suppliers discussed below. Total water use during regular daily operation is estimated at less than 5,000 gallons per day. This is considered an exempt use, which would not require a new water right to be obtained under Oregon Revised Statutes (ORS) 537.545. The Applicant may either construct an exempt well or obtain bulk water from one of the suppliers below for the purpose of supplying water to the O&M buildings.

Solar panels may require periodic washing to minimize the effects of dust and dirt accumulation on energy production. The need for, and frequency of, solar panel washing will be dependent on weather conditions; during drought conditions when there is more dust, the panels may require washing. For the purpose of this analysis, it is conservatively assumed that the solar array panels will be washed once a year. At an estimated 0.26 gallons (1 liter) per panel, with a total of 2,555,202 panels, the Facility would use approximately 675,000 gallons per year for panel washing. Advancements in robotic panel cleaning have the potential to dramatically reduce the water needs for solar panel washing, and washing may not need to be conducted at all. Therefore, the Applicant's estimate likely overestimates the amount of water that will actually be used. Daily

water usage for panel washing that exceeds exempt well quantities will be supplied by water trucked to the site from the suppliers discussed below.

Water trucks or similar with minimum 500-gallon capacity will be available on site during fire season, as designated in the Draft Construction and Operational Wildfire Mitigation Plans attached to Exhibit M; however, this water is not expected to be used except in case of emergency.

3.0 Water Sources – OAR 345-022-0160(1)(b)(B)

(B) A description of each source of water and the applicant's estimate of the amount of water the facility will need during construction and during operation from each source under annual average and worst-case conditions;

3.1 Construction

The Applicant or its third-party construction contractor can obtain construction water from the City of Wasco and/or the City of Rufus under existing municipal water rights. The Applicant has contacted these municipalities, and both have indicated willingness and ability to supply water for the Facility in the amounts listed in Table 02-2. Attachment 02-1 contains a record of communication with the City of Wasco, and the Applicant has engaged in communications with the City of Rufus to confirm their willingness and ability (pers. comm., Brooke Hendrickson, City of Rufus, via phone, April 15, 2026).¹ During periods of high demand, water may be sourced from more than one of the potential suppliers listed below and/or from another supplier with an existing water right. The Applicant may also identify additional water suppliers with existing water rights prior to construction.

Table 02-2. Potential Water Suppliers

Supplier Name	Contact	Quantity Available
City of Wasco	Ian Melzer	100,000 gallons per day
City of Rufus	Brooke Hendrickson	200,000 gallons per day
Total		300,000 gallons per day

Water will most likely be contracted with the Facility construction contractor, though the Applicant may contract directly with the suppliers. Letters documenting formal commitments from each water supplier will be provided prior to construction. Based on communications with the potential water suppliers listed above, the Applicant believes the contacts made to date, which amount to non-binding commitments to supply a total of 300,000 gallons per day, will be sufficient for Facility construction.

¹ Water availability from City of Rufus includes infrastructure improvements.

3.2 Operation

Operations water use will be minimal and general daily use will qualify as exempt under ORS 537.545(1)(f), which allows use of groundwater for any single industrial or commercial purpose in an amount not exceeding 5,000 gallons per day. Exempt industrial water uses include drinking, flushing toilets, using sinks, and other general industrial uses. The Applicant may either construct an exempt well, allowed under ORS 537.545, or obtain bulk water from one of the above suppliers with existing water rights.

During operation, periodic solar panel washing may use approximately 675,000 gallons of water each year. Daily water usage for panel washing that exceeds exempt well quantities will be supplied by water trucked to the site from the same sources as during construction. These suppliers have water capacity to supply up to 109.5 Mgal annually (300,000 gallons per day; Attachment O2-1).

4.0 Wastewater and Water Loss – OAR 345-022-0160(1)(b)(C)

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

4.1 Construction

Water use for concrete production and dust control will result in water loss primarily through evaporation from wetted road surfaces and from curing concrete. No water used on the site will be discharged into wetlands, streams, and other waterways. Due to the dry conditions at the proposed Facility and the relatively low rates of water use and application, it is expected that any excess water used during construction will be lost within or near the proposed Facility site boundary, primarily through evaporation and infiltration. Construction-related stormwater runoff will be managed according to a National Pollutant Discharge Elimination System 1200-C permit and the Applicant will follow Oregon Department of Environmental Quality (ODEQ) rules governing construction stormwater runoff. Most of the area within the site boundary is vegetated, which will serve as a buffer to promote infiltration and minimize erosion. Likewise, the Applicant will follow ODEQ rules regarding the disposal of sanitary wastewater and use of portable toilets.

4.2 Operation

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

5.0 Thermal Power Plants – OAR 345-022-0160(1)(b)(D)

(D) For thermal power plants, a water balance diagram, including the source of cooling water and the estimated consumptive use of cooling water during operation, based on annual average conditions;

The Facility is not a thermal power plant. Thus, OAR 345-022-0160(1)(b)(D) is not applicable.

6.0 Groundwater Permit Information – OAR 345-022-0160(1)(b)(E)(F)

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

(F) If the proposed facility would need a groundwater permit, a surface water permit or a water right transfer, information to support a determination by the Council that the Water Resources Department should issue the permit or transfer of a water use, including information in the form required by the Water Resources Department under OAR Chapter 690, Divisions 310 and 380; and

The Facility does not require any groundwater permits or surface water permits. As discussed above, sufficient water for construction can be obtained from the nearby municipalities under existing municipal water rights. Daily use of water during operation will be minimal and qualify as exempt under ORS 537.545(1)(f), which allows certain industrial or commercial uses of up to 5,000 gallons per day. Exempt industrial water uses include drinking, flushing toilets, using sinks, and other general industrial uses. For the O&M buildings and solar panel washing during operations, the Applicant expects to either rely on an exempt well allowed under ORS 537.545 or, if needed, to obtain bulk water from the same water sources identified for construction.

7.0 Water Use Mitigation – OAR 345-022-0160(1)(b)(G)

(G) A description of proposed actions to mitigate the adverse impacts of water use on affected resources.

No adverse impacts are expected to result from Facility water use during construction or operations; therefore, no mitigation measures are proposed.

8.0 Approval Standards and Submittal Requirements

Table 02-3. Approval Standards and Submittal Requirements Matrix

Requirements	Location
OAR 345-022-0160 State and Local Laws and Regulations	–
Submittal Requirements	
To assist the Council in determining compliance with all state and local laws and regulations applicable to EFSC and the siting process, submit the following, as directed by the project order described in OAR 345-015-0160:	–
(b) Information about anticipated water use during construction and operation of the proposed facility. The applicant must include:	Section 2.0
(A) A description of the use of water during construction and operation of the proposed facility;	Section 2.0
(B) A description of each source of water and the applicant's estimate of the amount of water the facility will need during construction and during operation from each source under annual average and worst-case conditions;	Section 3.0
(C) A description of each avenue of water loss or output from the facility site for the uses described in (A), the applicant's estimate of the amount of water in each avenue under annual average and worst-case conditions and the final disposition of all wastewater;	Section 4.0
(D) For thermal power plants, a water balance diagram, including the source of cooling water and the estimated consumptive use of cooling water during operation, based on annual average conditions;	Section 5.0 - N/A
(E) If the proposed facility would not need a groundwater permit, a surface water permit or a water right transfer, an explanation of why no such permit or transfer is required for the construction and operation of the proposed facility;	Section 6.0
(F) If the proposed facility would need a groundwater permit, a surface water permit or a water right transfer, information to support a determination by the Council that the Water Resources Department should issue the permit or transfer of a water use, including information in the form required by the Water Resources Department under OAR Chapter 690, Divisions 310 and 380; and	Section 6.0
(G) A description of proposed actions to mitigate the adverse impacts of water use on affected resources.	Section 7.0

Attachment 02-1. Water Source Letter



City of Wasco

PO Box 26, 1017 Clark Street, Wasco, OR 97065

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March 18th, 2026

To Whom It May Concern:

This letter is to confirm that the City of Wasco currently estimates that the City has the capacity to provide the requested 385 million gallons of water during the 37-month construction period, at a maximum daily rate of 100,000 gallons, for the proposed Brookfield Renewable solar and battery storage project at the proposed Speedway Energy Facility. These estimates are based on current conditions and operational capabilities of the City water system.

This water can only become available after the completion of the Biglow Canyon Wind Farm solar expansion project. This is not a guarantee to provide any specific quantity or quality of water; however, it may be considered a non-binding letter of intent to supply water in accordance with a water purchase agreement to be negotiated in the future.

Sincerely,

A handwritten signature in blue ink that reads "Ian Melzer". The signature is written in a cursive, flowing style.

Ian Melzer
City Clerk/Recorder
Wasco City Hall