

ENVIRONMENTAL • ENGINEERING • LAND SURVEYING

April 23, 2015

Mr. Jerry Lein
Public Utility Analyst
ND Public Service Commission
600 East Boulevard Avenue, Dept. 408
Bismarck, ND 58505-0480



Dear Mr. Lein:

Carlson McCain has completed the post-construction inspection and report for the Basin Electric Pioneer Generation Station Phase II - Williams County, Case No. PU-12-509. It appears that the Project has been constructed in accordance with the ND Public Service Commission Findings of Fact, Conclusions of Law, and Order for the Project.

Please contact me at 701-595-7003 if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Krapp', written in a cursive style.

Ryan Krapp
Natural Resource Specialist

Attachment

POST-CONSTRUCTION INSPECTION REPORT

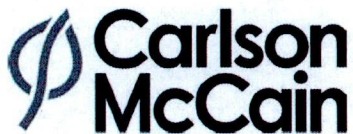
Basin Electric Power Cooperative
Lonesome Creek Station - Phase II
McKenzie County, North Dakota

PSC Case No. PU-12-790
Carlson McCain Project #5066

Prepared for:

North Dakota Public Service Commission
600 East Boulevard Avenue, Dept. 408
Bismarck, ND 58505-0408

April 23, 2015



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EXECUTIVE SUMMARY

The North Dakota Public Service Commission (Commission) approved an energy conversion facility application for Basin Electric Power Cooperative (Basin Electric) to construct the Lonesome Creek Station, Phase II (Project) consisting of two 45 MW simple cycle natural gas-fired combustion turbines to be located at the existing site of the Lonesome Creek Station Unit 1 in Section 23, Township 150 North, Range 101 West, approximately 14 miles west of Watford City, North Dakota. The Project site consists of approximately 7 acres under permanent conversion of a larger 48.4 acre plant site as depicted in the Application. Basin Electric used temporary construction areas surrounding the Project site, all on a 160 acre parcel purchased by Basin Electric.

The Commission issued its Finding of Fact, Conclusion of Law and Order of the Commission in Case No. PU- 12-790 dated March 26, 2014, granting a Certificate of Site Compatibility for Energy Conversion Facility No. 37. The Project construction was reported as complete on December 29, 2014, with ongoing reclamation activities occurring in spring 2015.

The Commission retained Carlson McCain, Inc. (Carlson McCain) to complete construction inspections applying engineering and science principles for the purpose of ensuring that the Project has been constructed in compliance with the siting laws (N.D.C.C. 49-22), rules (N.D. Administrative Code Article 69-09) and applicable Commission orders. Project construction inspection occurred on August 10, 2014, and the post-construction inspection was completed on March 25, 2015.

Overall, the Project appears to be constructed as designed with minimal impacts to the surrounding natural and human environment. Basin Electric has submitted an application for approval to construct additional turbines (Phase III) at this Project site. The Project site will likely be under construction during the spring or summer of 2015. Ongoing site maintenance will be performed during the Phase III construction and continue over the life of the Lonesome Creek Station.

After review of the Commission case docket and multiple site inspections, Carlson McCain has found the Lonesome Creek Station Phase II (Case No. PU-12-790) has been constructed in compliance with the siting laws (N.D.C.C. 49-22) and rules (N.D. Administrative Code Article 69-09) and applicable Commission orders.

1.0 BACKGROUND

1.1 Introduction

The North Dakota Public Service Commission (Commission) approved an energy conversion facility application for Basin Electric Power Cooperative (Basin Electric) to construct the Lonesome Creek Station, Phase II (Project) consisting of two 45 MW simple cycle natural gas-fired combustion turbines to be located at the existing site of the Lonesome Creek Station Unit 1 approximately 14 miles west of Watford City, North Dakota. The Project site consists of approximately 7 acres under permanent conversion of a larger 48.4 acre plant site as depicted in the Application. Basin Electric used temporary construction areas surrounding the Project site, all on a 160 acre parcel purchased by Basin Electric in Section 23, Township 150 North, Range 101 West in McKenzie County, North Dakota.

The Commission issued its Finding of Fact, Conclusion of Law and Order of the Commission in Case No. PU- 12-790 dated March 26, 2014, granting a Certificate of Site Compatibility for Energy Conversion Facility No. 37. The Project construction was reported as complete on December 29, 2014, with ongoing reclamation activities occurring in spring 2015.

1.2 Purpose and Scope of Inspection

The North Dakota Energy Conversion and Transmission Facility Act (North Dakota Century Code Chapter 49-22) authorizes the Commission to determine that the location, construction, and operation of jurisdictional energy conversion and transmission facilities will produce minimal adverse effects on the environment and the welfare of citizens of North Dakota. Construction inspections ensure the project is constructed in compliance with the siting laws and rules and the applicable Commission Findings of Fact, Conclusions of Law, and Order (Order).

The Commission retained Carson McCain to complete construction inspections of the Project. The inspection processes included a review of the Siting Plan, Order, and other applicable documents to determine Project-specific siting and construction requirements; site visits and inspection of facilities; documentation of compliance; and a final report summarizing findings. This report includes, but is not limited to, documentation of site visit observations, documentation of compliance deficiencies, and a summary of issues that should be addressed for the Project to be considered complete and in full compliance.

2.0 PROJECT REVIEW

2.1 Methods

Carlson McCain reviewed North Dakota siting laws and rules, the Applications for the Certificate of Corridor Compatibility and Route Permit (Application), and the Order for the Project to identify what Project-specific documentation was required for compliance. Carlson McCain then reviewed Project documents in the Commission Online Case Search to identify those siting laws and rules and Application and Order assertions that had written verification, those that still required documentation, and those that required physical site verification.

Carlson McCain Inspector Ryan Krapp visited the Project site on September 10, 2014, to review construction progress and practices. Basin Electric and the general contractor, Salisbury Industries (SI), were met at the project field office on Those in attendance were Chris Johnson, Basin Electric Construction Coordinator, and Scott Moore, SI-Environmental, Health and Safety Representative. Mr. Cole Kothman replaced Mr. Johnson as the Lonesome Creek Station construction coordinator in September, 2014. Carlson McCain Inspector Mark Suchy meet Mr. Kothman at the Project site for the post-construction inspection on March 25, 2015.

2.2 Orders

The following section includes discussion of the list of components of the Project that were asserted in the Application and Order which could be documented during the post-construction inspection to verify compliance with siting laws, rules and the Order for the Project, by either written documentation or physical site verification.

On March 26, 2014, the Commission ordered:

1. Certificate of Site Compatibility No. 37 is issued to Basin Electric Power Cooperative authorizing the construction, operation and maintenance of two nominal 45 MW simple cycle aero derivative natural gas combustion turbines and associated facilities as identified in the application.
2. For purposes of the Certificate, the Site consists of approximately 48.4 acres in Section 23, Township 150 North, Range 101 West, McKenzie County, North Dakota, as described in the Application.
3. Basin Electric shall request a jurisdictional determination from the Commission under N.D. Admin. Code chapter 69-06-02.1 prior to the construction of any improvements or facilities outside of the Commission designated Site.

4. Basin shall file with the Commission a copy of its Risk Management Plan required for ammonia storage exceeding 10,000 lbs as set forth in the EPA's Clean Air Act Section 112(r) regulations (40 CFR Part 68 130).
5. The January 22, 2014, Certification Relating to Order Provisions-Energy Conversion Facility Siting, with accompanying Tree and Shrub Mitigation Specifications is incorporated by reference and attached to this Order.
6. To the extent there are any conflicts or inconsistencies between Basin Electric's application and the January 22, 2014, Certification, the Certification provisions control.

2.3 Certification Relating to Order Provisions – Energy Conversion Facility Siting

The Commission issued the Certificate of Site Compatibility for Energy Conversion Facility, Certificate Number 37 on January 22, 2014. Mr. Myron Steckler, a representative of Basin Electric Power Cooperative (Company) with authority to bind Company to requirements to be set forth by the Commission in its Order and certified the following:

- 1. Company understands and agrees that the Certificate of Site Compatibility will be issued by the Commission subject to the conditions and criteria set forth in Chapter 49-22 of the North Dakota Century Code and Chapter 69-06-08 of the North Dakota Administrative Code, and that Company shall be responsible for compliance with this order and conditions and criteria set forth in the applicable laws and rules.**

Docket #33 & #34 - Findings of Fact, Conclusions of Law and Order, Commission Motion of Adoption. No issues of blatant non-compliance with this order and conditions and criteria set forth in the applicable laws and rules have been found during the post-construction inspection.

Order #1 considered satisfied.

- 2. Company agrees to hold a preconstruction conference prior to commencement of any construction, which must include a Company representative, its construction supervisor, and a representative of Commission Staff, to ensure that Company fully understands the conditions set forth in the Commission's order.**

Docket #38 – Prehearing Conference Minutes and Notice of Intent to Start Construction.

Order #2 considered satisfied.

- 3. Company agrees to comply with the rules and regulations of all other agencies having jurisdiction over any phase of the proposed energy conversion facility including all city, township, and county zoning regulations.**

Included in Application for waiver of procedures and consolidated certificate of site compatibility (Docket #5)

Order #3 considered satisfied.

- 4. Company understands and agrees that it shall obtain all other necessary licenses and permits, and shall provide copies of all licenses and permits to the Commission prior to construction activity associated with the energy conversion facility that requires said license or permit.**

Table 6-1 in the Application for Certificate of Site Compatibility (Docket #5) identified potential permits and approvals needed for the Project. As identified within Table 6-1, Basin Electric did provide the Rural Utility Services (RUS) required NEPA compliance documents; the Environmental Assessment as Docket #28 and the Finding of No Significant Impact (FONSI) as Docket #32. The Risk Management Plan as required by Order #4 above and herein, that is required for ammonia storage exceeding 10,000 lbs as set forth in the EPA's Clean Air Act Section 112(r) regulations (40 CFR Part 68.130) was submitted post-construction (April 14, 2015) to the Commission per request of third party inspector. Also requested and submitted was the McKenzie County Building Permit, ND Dept. of Health NDPDES wastewater discharge permit(s), Offsite Consequence Analysis EPA (40 C.F.R. 68), and Site Emergency Management Plan (EAP). Commission accepted submissions as Docket #76

Order #4 considered satisfied.

- 5. Company agrees to inform the Commission and the Commission's third-party construction inspector of its intent to start construction on the energy conversion facility prior to the commencement of construction. Once construction has started, Company shall keep the Commission and the Commission's third-party construction inspector updated of construction activities on a weekly basis.**

*Docket #38 – Tele-conference notes & notice of start of construction.
Docket #'s 41-43, 46-47, 49-61 & 63-74 – Weekly progress reports.*

Order #5 considered satisfied.

- 6. Company understands and agrees that the Certificate of Site Compatibility is subject to suspension or revocation and may, in an appropriate and proper case, be suspended or revoked for failure to comply with the Commission's order, the conditions and criteria of the certificate or subsequent modification,**

or failure to comply with the applicable statutes, rules, regulations, standards, and permits of other state or federal agencies.

No concerns of non-compliance with the Certificate of Site Compatibility have been found during the post-construction inspection.

Order #6 considered satisfied.

- 7. Company agrees to maintain records that will demonstrate that it has complied with the requirements of the Commission's order and the Certificate of Site Compatibility, and that it will preserve these records for Commission inspection at any reasonable time upon reasonable notice.**

With the post-construction submission of missing documents (Docket #76) Carlson McCain believes Basin Electric has maintained and submitted records that demonstrate compliance with the requirements of the Commission's order and the Certificate of Site Compatibility.

Order #7 considered satisfied.

- 8. Company agrees to construct and operate the energy conversion facility in accordance with all applicable safety requirements.**

Through Docket #'s 41-43, 46-47, 49-61 & 63-74 (weekly progress reports) Basin Electric documented safety procedures and reported injuries or incidences and the corrective actions taken.

Order #8 considered satisfied.

- 9. Company agrees to construct and operate the energy conversion facility in the manner described in Company's application, in any late filed exhibits, and supplemental materials, (Application). To the extent there are any conflicts or inconsistencies between Company's Application and the provisions in this Certification Relating to Order Provisions, the Certification provisions control.**

Carlson McCain believes Basin Electric has constructed and is operating as indicated in "Application". No additional changes were noted.

Order #9 considered satisfied.

- 10. Company agrees to report promptly to the Commission the presence in or near the approved site of any critical habitat of threatened species, endangered species, bald eagles, or golden eagles that Company becomes aware of and which were not previously reported to the Commission.**

Discussions with Basin Electric construction manager during the on-site visits indicated that no threatened species, endangered species, bald eagles, or golden eagles were discovered in or near the Project during construction and therefore no documents were submitted.

Order #10 considered satisfied.

- 11. Company understands and agrees that all cultural resource mitigation plans must be submitted to the North Dakota State Historic Preservation Office (SHPO) and approved prior to the start of any fieldwork and construction activity in the affected area.**

Company submitted cultural resource reports to SHPO. The SHPO verified that no cultural resources will be affected. (Docket #5).

Order #11 considered satisfied.

- 12. Company understands and agrees that if any cultural resource, paleontological site, archeological site, historical site, or grave site is discovered during construction, it must be marked, preserved and protected from further disturbances until a professional examination can be made by the State Historical Society, a report of such examination is filed with the Commission, and clearance to proceed is given by the Commission.**

Unanticipated Discovery Plan also submitted in Docket #4. It was discussed with the Company construction project manager that no unanticipated cultural resources were discovered.

Order #12 considered satisfied.

- 13. Company understands and agrees that all buried facility crossings of graded roads shall be bored unless the responsible governing agency specifically permits Company to open cut the road.**

No buried facilities were constructed under government roads during Project construction.

Order #13 considered satisfied.

- 14. Company understands and agrees that all pre-existing township and county roads and lanes used during construction must be repaired or restored to a condition that is equal to or better than the condition prior to the construction of the energy conversion facility and that will accommodate their previous use, and that areas used as temporary roads or working areas during construction must be restored to their original condition.**

A county road (140th Avenue NW) was used to access the Site during Project construction. No adverse effects was evident at time of inspections nor complaints issued.

Order #14 considered satisfied.

- 15. Company understands and agrees that construction must be suspended when weather conditions are such that construction activities will cause irreparable damage to roads or land, unless adequate protection measures approved by the Commission are taken.**

Through Docket #'s 41-43, 46-47, 49-61 & 63-74 (weekly progress reports) Basin Electric documented adverse weather conditions occasionally and responded appropriately to conditions.

Order #15 considered satisfied.

- 16. During construction, at least 12 inches of topsoil, where available (or topsoil to the depth of cultivation, whichever is greater), over and along areas where facilities will be placed must be stripped and segregated from subsoil. Any area on which excavated subsoil will be placed must first be stripped of topsoil. After backfilling with subsoil is completed, any excess subsoil must be placed over the excavation area, blending the grade into existing topography. Topsoil must not be placed within the footprint of the facilities, and must be placed over areas containing topsoil.**

Carlson McCain's construction inspection on September 10, 2014, documented adequate topsoil stripping and storage areas (Docket #62). The March 25, 2015 on-site visit documented that the top-soil has been replaced over the temporary construction lay down area. Inspection revealed some leftover construction debris in the area. Basin Electric indicated that cleanup of the debris in this area would occur. This area will be utilized again for Phase III construction due to start in May 2015.

Order #16 considered satisfied.

- 17. Company understands and agrees that reclamation, fertilization, and reseeded is to be done according to the Natural Resources Conservation**

Service recommendations, unless otherwise specified by the landowner and approved by the Commission.

The post-construction inspection of the Site on March 25, 2015, documented the interim reclamation (topsoil replacement) of the temporary construction workspace east of the permanent facilities. The area has not and will not be replanted at this time due to anticipated use of the area for LCS Phase III temporary construction workspace in Spring/Summer 2015. Lands not in use owned by Basin Electric are being placed into the federal CRP program and will be replanted according to specifications. Straw bales were on-site and Basin indicated they would be spread as cover during planting around site.

Order #17 considered satisfied.

18. Company understands and agrees that its obligation for reclamation and maintenance of the approved site will continue throughout the life of the energy conversion facility.

*The soils in the area are thin and very sandy. The ditches and slopes around the site have been seeded with grasses and covered with fiber matting in many areas; however, the weedy species Russian thistle (*Salsola collina*) and Kochia (*Kochia scoparia*) are prevalent around the site. These species are not considered noxious and are providing soil stability at this time. Mr. Cole indicated that BEPE will continue to commit to control the weeds around the site by contracting spraying again this spring/summer. Mowing has been done in some areas and it was recommended to continue this practice to aid the planted grass establishment.*

Order #18 considered satisfied with the Company commitment to monitor and maintain the Site as necessary.

19. Company is aware that North Dakota law requires that all companies that own or operate electric generation of any size for the primary purpose of resale must comply with the standards of the National Electrical Safety Code in effect at the time of construction of the generation facility, and agrees to comply with that requirement.

Basin Electric is a regional wholesale electric generation and transmission cooperative owned and controlled by the 134 cooperatives it serves. Basin Electric was created in May 1961 as a result of regional efforts by electric distribution cooperatives and the Rural Electrification Administration, now the Rural Utilities Service (RUS). Basin Electric serves approximately 2.8 million customers in nine states and is committed to and has demonstrated compliance with the National Electrical Safety Code over the years of operation.

Order #19 considered satisfied.

20. Company agrees to comply with the Tree and Shrub Mitigation Specifications.

As documented in the Application (Docket #5) and reiterated by Basin Electric during the onsite meetings, no trees or shrubs were present and, therefore, none were removed from the Project area. No mitigation is required.

Order #20 considered satisfied.

21. Company understands and agrees that it shall repair or replace all fences and gates removed or damaged during all phases of construction and operation of the proposed energy conversion facility.

No fences or gates were disturbed during construction and as verified during inspections.

Order #21 considered satisfied.

22. Company understands and agrees that it shall repair or replace all drainage tile broken or damaged as a result of construction and operation of the proposed energy conversion facility.

No agricultural drainage tile is located in the construction area.

Order #22 considered satisfied.

23. Company understands and agrees that it shall work with landowners and residents to mitigate any increase in television and residential radio interference that results from the construction of the energy conversion facility.

Basin Electric indicated there were no complaints related to television and residential radio interference.

Order #23 considered satisfied.

24. Company understands and agrees that staging areas or equipment shall not be located on land owned by a person other than Company unless otherwise negotiated with landowners.

Basin Electric owns the 160 acre parcel including and surrounding the Project site. All staging areas and equipment stayed within the property boundaries.

Order #24 considered satisfied.

25. Company understands and agrees that it shall remove all waste that is a product of construction and operation, restoration, and maintenance of the site, and properly dispose of it on a regular basis.

Basin Electric indicated that construction waste was properly disposed of on a regular basis. Trash bins and concrete wash-out pits were found on-site during construction inspections (Docket #62 and Docket #'s 41-43, 46-47, 49-61 & 63-74). The March 25, 2015 on-site inspection revealed some leftover construction debris in the area. Basin Electric indicated that cleanup of the debris in this area would occur before this area will be utilized again for Phase III construction.

Order #25 considered satisfied.

26. Company agrees that it shall, as soon as practicable upon the completion of the construction of the energy conversion facility, restore the area affected by the activities to as near as is practicable to the condition as it existed prior to the beginning of construction.

See Order #17 above.

Order #26 considered satisfied with the Company plan to reuse the Site in the near future for additional construction purposes.

27. Company understands and agrees that it shall provide any necessary safety measures for traffic control or to restrict public access to the energy conversion facility.

Basin Electric erected chain-link fence around the temporary construction site and Station. Access to the site was monitored. Fencing was found to be appropriate during the construction inspections (Docket #62 and Docket #'s 41-43, 46-47, 49-61 & 63-74).

Order #27 considered satisfied.

28. Company understands and agrees that it shall advise the Commission of any extraordinary events which take place at the site of the energy conversion facility, including injuries to any person, the death of any threatened or endangered species within five business days of such event.

See Order #10 above. Additionally, any personal injuries were reported and remedies outlined within the weekly progress reports (Docket #'s 41-43, 46-47, 49-61 & 63-74).

Order #28 considered satisfied.

29. Company understands and agrees that it shall implement a procedure for how complaints concerning the proposed energy conversion facility will be handled by Company.

Basin Electric indicated they received no complaints from surrounding landowners or agencies over the course of project construction.

Order #29 considered satisfied.

30. Upon request, Company agrees to provide the Commission with engineering design drawings showing surveyed structure(s) prior to construction.

Construction plans and engineering drawings were supplied in the Application and as Exhibits 1-5 (Docket #20-24).

Order #30 considered satisfied.

31. Company understands and agrees that it shall inform the Commission in writing of any plans to modify the energy conversion facility, or of any plans to modify the site plan for the energy conversion facility. Company understands and agrees to obtain written approval from the Commission prior to any modifications to the site plan or the energy conversion facility, associated facilities, and roadway locations. Approval may be granted after notice and opportunity for hearing.

There were no changes to the Project Plan.

Order #31 considered satisfied.

32. Company agrees to provide the Commission with both an electronic and a paper copy of the site approved by the Commission and the facility design specifications for the construction of the energy conversion facility showing the location of the energy conversion facility as built, and will provide this information within 3 months of the completion of the construction. Company also agrees to provide an electronic version of the site approved by the Commission and the facility design specifications for the construction of the energy conversion facility showing the location of the energy conversion facility as built that can be imported into ESRI GIS mapping software within 3 months of the completion of the construction. This electronic map data must be referenced to the North Dakota coordinate system of 1983, North and/or South zones US Survey feet (NAD 83) UTM Zone 13N or 14N feet (NAD 83), or geographic coordinate system (WGS 84) feet. The vertical data must be in the appropriate vertical datum for the coordinate system used. All submissions must specify the datum in which the data was developed.

Basin Electric submitted the facility design specifications, final As-Built site map and a CD of the electronic As-Built files for the Project to the Commission and are recorded as Docket #75.

Order #32 considered satisfied.

33. Company understands and agrees that the authorizations granted by the Certificate of Site Compatibility for the energy conversion facility are subject to modification by order of the Commission if deemed necessary to protect further the public or the environment.

The Commission did not order any modifications to the Project to further protect the public or the environment.

Order #33 considered satisfied.

34. Company understands and agrees that in the event Company desires to construct, within any site granted by a Certificate of Site Compatibility in this proceeding, an energy conversion facility that was not requested in Company's application in this proceeding, Company shall apply for a Certificate of Site Compatibility for the facility.

Basin Electric understands that any other facility construction will require a new application for a Certificate of Site Compatibility for such facility. Phase III is currently under consideration by the Commission.

Order #34 considered satisfied.

35. Company shall notify the Commission, as soon as reasonably possible, if any damage, as defined by North Dakota Century Code Chapter 49-23, occurs to underground facilities during construction conducted under the certificate or permit issued in this proceeding. In the event of any damage to underground facilities, Company shall suspend construction in the vicinity of the damage until compliance with One-Call Excavation Notice System requirements under North Dakota Century Code Chapter 49-23 has been determined and clearance to proceed has been given by the Commission.

No damage was reported to have occurred to underground facilities within weekly reports. Basin Electric understood that continuation of facility construction would require a new utility clearance with the One-Call system and clearance from Commission.

Order #35 considered satisfied.

36. The certificate of site compatibility is subject to suspension or revocation and may, after hearing, be suspended or revoked for failure to comply with the Commission's order, requirements of the One-Call Excavation Notice System under North Dakota Century Code Chapter 49-23, the conditions and criteria of the certificate or permit or subsequent modification, or failure to comply with applicable statutes, or rules, regulations, standards, and permits of other state or federal agencies.

The contractor that Basin Electric retained on this project, Salisbury Industries (SI) contacted the One-Call Excavation Notice System before any construction digging. Basin Electric provided the one-call log as requested on April 14, 2015 and is found in Docket #76.

Order #36 considered satisfied.

3.0 CONCLUSION

Overall, the Project appears to be constructed as designed with minimal impacts to the surrounding natural and human environment. Thereby, after review of the Commission case docket and multiple site inspections Carlson McCain has found the Basin Electric Lonesome Creek Station - Phase II (Case No. PU-12-790) has been constructed in compliance with the siting laws (N.D.C.C. 49-22) and rules (N.D. Administrative Code Article 69-09) and applicable Commission orders.

Appendix A

March 25, 2015, Photos



Figure 1. Photo from entrance road to the Lonesome Creek (LCS) Station looking southeast. Phase II construction (Unit 3) is visible to the right and the former temporary laydown area visible in background. Straw bales are to be used during reseeding efforts this spring.

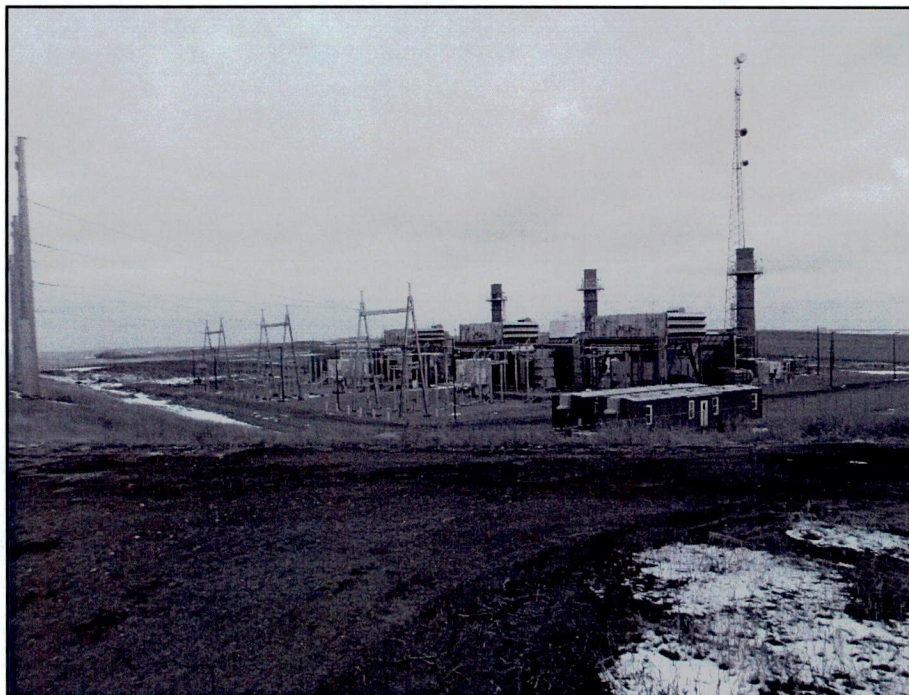


Figure 2. Overview of LCS looking northwest from the former temporary construction laydown area.

Appendix A



Figure 3. Photo looking north of the temporary construction laydown area (right). Gravel surface has been removed and topsoil replaced in December 2014. The area will be used again during construction of Phase III starting May 2015.



Figure 4. Overview looking north from the southwest corner of LCS. Erosion control matting in place on hillside and functioning from LCS Phase I construction. Weedy species will be mowed and sprayed as part of ongoing site maintenance.