

# TECHNICAL MEMORANDUM



To: Teri Bowman  
Company: NV Energy  
Copy to: Martin Camou  
Project No.: 020128.R  
From: Steve Carroll  
Date: August 31, 2011  
Pages: 11

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**Subject: Responses to general comments contained in letter from John Taylor (NDEP), dated June 28, 2011**

In the summary below, comments or requests from NDEP are contained under NDEP Requests in quotation marks and italicized. NV-Energy North Valmy Power Plants responses are contained in the immediately following indented paragraphs, Under NVPP Response.

**NDEP Request:**

*"The Modification request is less than clear as to what is being modified or requested to be modified. Please include a cover letter that details the requests for modification. Also, please provide detailed instructions for which portions of the current application will be amended and/or replaced by this modification request."*

**NVPP Response:**

This application to amend the existing Class III Landfill, at the North Valmy Power Plant (NVPP) specifically requests the following:

- An increase in the permitted lateral and vertical extent of the Class III landfill.
- Addition of evaporation pond solids and industrial solid waste generated within the (NVPP) facility.

In support of this, the modification request provides a more detailed presentation of waste characterization, landfill design, operating, closure and post-closure plans than had been contained in the original application to operate the landfill, dated March, 2001; currently on file with NDEP.

**NDEP Request:**

*"Please note that the requirements to determine the background values via the Statistical Method(s) in section 5.8 are now due. Please provide them for review and comment within 30 days of receipt of this letter. Once approved or amended they will become regulated values and part of the Groundwater Monitoring Plan."*

**NVPP Response:**

NV Energy proposes to develop a site-specific background standard for each of the monitoring wells at the site using a statistical method to be selected after the completion of eight sample rounds from each of the landfill monitoring wells. This condition will be met after the September 2011 sampling round and a final statistical method will be selected by the first of October, at which time the Groundwater Monitoring Plan will be amended appropriately. This analysis will be performed on key indicators of leachate that might be expected from coal combustion product materials. These will be Mercury, Chromium, Cadmium, Sodium, Chloride, Sulfate, Total Dissolved Solids, Specific Conductivity and pH. The heavy metals in this suite have never been detected in water samples from

landfill monitoring wells during the past 10 years of monitoring. Most of the other parameters have generally been below MCL, where a standard exists, throughout the period of monitoring. This information is summarized in Appendix A of this memorandum.

**NDEP Request:**

*"Additionally, please include the Groundwater Monitoring Plan within the application as an Appendix and revise the Table of Contents to reflect the change."*

**NVPP Response:**

The groundwater monitoring plan has been included as Appendix J in the revised application and is referenced in the text. The Table of contents has been revised to reflect this and other changes listed in the remainder of this document.

**Responses to specific comments contained in letter from John Taylor (NDEP), dated June 28, 2011.**

**NDEP Request:**

*"Section 4.0 Solid Waste Characterization*

*Please provide TCLP analysis for the Evaporation Pond Solids. Include periodic characterization of all wastes to be disposed (fly ash, bottom ash and pond solids) in accordance with NAC 444.737 into Section 4.0. Refine the description of Industrial solid waste(s) to be disposed in conjunction with a characterization consistent with NAC 444.737. Additionally include any descriptive criteria that would identify any character that may create an environmental hazard as specified in NAC 444.737".*

**NVPP Response:**

Section 4.0 has been subdivided to contain sections 4.1 "Fly Ash and Bottom Ash", 4.2 "Evaporation Pond Solids", and 4.3 "Industrial Solid Waste". These sections describe the wastes in question, estimated future volumes, handling methods, and characterization methods. TCLP analyses for each of the waste streams are contained in the expanded Appendix C. The revised Section 4.0 with sub-sections 4.1, 4.2 and 4.3 are contained on Page 7 and two addenda to Page 7.

**NDEP Request:**

*"Please revise Section 5.7 to reflect all waste that will require characterization (C&D, Evap Ponds)."*

**NVPP Response:**

Section 5.7 has been revised to refer to each of the waste streams described in section 4.0.

**NDEP Request:**

*"Please provide the engineering calculations that were performed in support of the design of the Run-on and Run-off controls stated in section 5.9. Is the retention basin noted installed and are the drainage ditches in place at the present time?"*

**NVPP Response:**

Section 5.9 has been revised to present the landfill runoff controls as they stand at this time. The proposed run-off controls and retention basin represented in the January 2011 submission of the revised application have been removed from this revision. Run-on is not a concern at the landfill as it occupies a topographic high.

**NDEP Request:**

*"Current Application*

*Please include the following information as required by NAC 444.733;*

*Include a description of the equipment and persons (number, job descriptions etc.) necessary to operate the site.*

For example, provide an estimation of the number and description of each piece of Waste Management Equipment, i.e. number of tippers, compactors etc. It is not necessary to include personnel [sic] equipment. Also please provide a hierarchical description for the personnel on site starting with the General Manager and working downward in conjunction with the number of people expected to fulfill that job.”

**NVPP Response:**

This requested revision refers to Sections 7.1 (Equipment) and 7.2 (Personnel) on Page 21. In response to NDEP’s request, this section has been revised to list the pieces of equipment used in operation of the Class III landfill site. Section 7.2 has been revised to list the personnel that will be used to operate the Class III landfill in hierarchical order from Plant Manager to waste handling contractors, with individual responsibilities.

**NDEP Request:**

“Section 7.3 provides for the Winnemucca Volunteer Fire Department to be the primary responder for fire and emergencies. However Winnemucca is some 40 miles distant with a response time well in excess of one hour. Accordingly, as required by NAC 444.733 NVPP shall provide for fire control, with commensurate training as required by #1 below. Additionally, NVPP will provide a **complete** plan of action as required in #2 below.

- 1 Provide for:
  - (a) Adequate fire control methods to extinguish and prevent the spread of accidental fires;
  - (b) The prevention of scattering of papers and other lightweight debris by portable litter fences or other suitable devices.
- 2 Include a **Plan of Action** to be used in the event of an emergency which might occur at the site. The **Plan** must include, without limitation, an organized, coordinated, technically and financially feasible course of action to be taken:
  - (a) If a fire occurs at the site, how and under what circumstances the fire department will be notified; including identifying the nearest fire department.
  - (b) To protect the safety of personnel and users of the site, include training for employees on first aid and the availability of emergency services. The site must have a telephone, radio or other similar communication device to enable personnel to contact the appropriate providers of emergency services.
  - (c) To shut down the site because of inclement weather or an act of god.
  - (d) If equipment breaks down, including the provision for and a description of backup equipment.
  - (e) If hazardous or toxic materials are released from the site.
  - (f) If the presence of leachate is detected in a structure for the collection of leachate which was previously dry or if a spill or leak occurs at a tank or surface impoundment for the storage of leachate.”

**NVPP Response:**

Section 7.3 has been revised to describe how NVPP will provide for fire control. In accordance with NAC 444.684, item 2a (#1a of NDEP letter dated 6/28/11), this lists the annual training provided to personnel and equipment available on-site for fire control and suppression at the Class III landfill site. The main responder in the event of additional assistance being required has been specified as Valmy Volunteer Fire Department, which is the closest fire department to the NVPP, at a distance of approximately 10 miles. Additional fire departments in the surrounding area are listed as secondary responders.

In accordance with NAC 444.684, item 2b (#1b of NDEP letter dated 6/28/11), the prevention of scattering of papers and other lightweight debris is addressed in the revised Section 7.3 by specifying that such lightweight combustible material will not be placed in the Class III landfill and that it will be removed from NVPP and placed in an off-site landfill used by NVPP’s garbage disposal contractor. Additionally, construction debris (Industrial Solid Waste) that may be placed in the Class III landfill will be covered by soil on as-needed basis, at least weekly to prevent the exposure of such waste.

A plan of action for fire emergency response, as required by NAC 444.684, item 4a (#2a of NDEP letter dated 6/28/11) is addressed in the "Emergency Procedures for Fire and/or Explosion" contained in Appendix I, which is referenced in the text of Section 7.3.

NAC 444.684, item 4b (#2b of the NDEP letter dated 6/28/11) requires that provision be made to protect the safety of personnel and users of the site. First aid and communication devices to contact emergency services are both available at the Class III landfill, which is located immediately adjacent to the NVPP. Communication devices, methods and on-site first responders are identified in the "Emergency Procedures for Fire and/or Explosion" contained in Appendix I and referenced in Section 7.3.

NAC 444.684, item 4c (#2c of the NDEP letter dated 6/28/11) requires that provision be made for closure of the site because of inclement weather or act of God. Scheduled weekly inspections of the landfill during its operation will be used to assess the need for suspension of operations as a result of weather related incidents or other acts of God. These are described in sections 7.8 (Erosion Control) and 7.10 (Inspections and Record Keeping).

NAC 444.684, item 4d (#2d of the NDEP letter dated 6/28/11) requires that provision be made for equipment breakdowns. Equipment breakdown would not prevent the safe operation of the site, as there is sufficient redundancy of earth moving equipment to permit soil movement for fire control and covering of exposed waste material in the event of a breakdown. Dust suppression is provided by water truck and a pipeline supplied sprinkler system. Fire suppression equipment housed at the NVPP also has sufficient redundancy to permit a response to emergencies at the Class III landfill site in the event of individual equipment failures.

NAC 444.684, item 4e (#2e of the NDEP letter dated 6/28/11) requires that an action plan be developed to address the potential for release of hazardous materials from the site. Waste stream characterization methods described in Sections 4.0, 4.1, 4.2, 4.3 and 5.7 are intended to ensure that only non-hazardous material is placed in the Class III landfill. The control of dust using truck and pipeline fed sprinklers described in Section 7.1 (Equipment) and the installation of a temporary soil cover, described in Section 7.6 (Compacted Waste Cover) will minimize the potential for windblown dust from the site. Measures to monitor and prevent the escape of leachate from the Class III landfill are described below.

NAC 444.684, item 4f (#2f of the NDEP letter dated 6/28/11) requires that an action plan be developed to address the presence of leachate in previously dry collection structures or of spills from leachate storage tanks or impoundments. All waste materials that will be placed in the Class III landfill will have previously been determined to be non-hazardous (described in Sections 4.0, 4.1, 4.2, 4.3 and 5.7) and will be placed in the landfill in a dry condition. Any release of leachate from the Class III landfill will be detected by a network of monitoring wells surrounding the site. The sampling schedule, list of analyzed parameters, assessment method and responses are described in detail in the Groundwater Monitoring Plan, which is located in Appendix J of the application and is referred to in the text of Sections 5.8 and 9.2.

**NDEP Request:**

*"Section 7.8*

*Please define what would necessitate a repair of the cover or what level of erosion would trigger a repair. For example, in both areal extent and depth "greater than 10 ft<sup>2</sup> and deeper than 2 inches."*

**NVPP Response:**

Section 7.8 has been revised to specify that any area showing erosion of three to six inches will be repaired within one week of being identified. Any area that has been eroded to a depth of greater

than six inches will be isolated using diversion and containment structures to mitigate further erosion while a permanent repair is implemented within one month of being identified.

**NDEP Request:**

*"Section 8.0 Closure Plan*

*It is not clear whether NVPP has requested that the modified language overwrite that in the current Application of [sic] amend it. Please clarify."*

**NVPP Response:**

The revised Section 8.0 is intended to overwrite that in the current application.

**NDEP Request:**

*"Remove the last sentence, this goes without saying but can be submitted as a modification to the current permit."*

**NVPP Response:**

This sentence has been removed.

**NDEP Request:**

*"The current Closure and Post-Closure Plan do not meet the regulatory criteria in NAC 444.6891 through 6894.*

*In accordance with NAC 444.743 (NAC 444.6891 Requirements for design and construction of system for final cover. (NRS 444.560))*

1. *The owner or operator of a Class I site shall install a system for a final cover which is designed to minimize infiltration and erosion. Except as otherwise provided in subsection 2, the system must be designed and constructed to:*
  - (a) *Have a permeability that is less than or equal to the permeability of any system for a bottom liner or natural subsoils present, or have a permeability no greater than 1 x 10<sup>-5</sup> centimeters per second, whichever is less;*
  - (b) *Minimize infiltration through the closed municipal landfill unit by the use of an infiltration layer which contains at least 18 inches of earthen material; and*
  - (c) *Minimize erosion of the final cover by the use of an erosion layer which contains at least 6 inches of earthen material which is capable of sustaining the growth of native plants."*

**NVPP Response:**

Section 8.2 on Pages 25 and 25 Addendum (1) has been revised to specify that the final cover will have permeability no greater than 1 x 10<sup>-5</sup> centimeters per second in accordance with NAC 444.6891. This will be achieved by mixing of soils available on site to meet that permeability standard, as indicated by infiltration testing. NV Energy will import additional low permeability soil to meet that standard, if required.

The revised Section 8.2 specifies a final soil cover thickness of 3 feet, of which the upper 6 inches will consist of un-compacted soil capable of supporting native vegetation.

**NDEP Request:**

*"Revise Section 8 (of current application) to reflect NAC 444.6892(1), (2), (3) & (6)"*

**NVPP Response:**

Section 8.1 has been revised to reflect NAC 444.6892 (1), (2), (3) and (6) by listing those requirements in the NAC as specific actions to be taken as part of the closure of the Class III landfill.

**NDEP Request:**

*"Include a section that meets the requirement of NAC 444.6893"*

**NVPP Response:**

Section 8.1 has also been revised to reflect NAC 444.6893 by listing those requirements as specific actions to be taken as part of the closure of the Class III landfill.

**NDEP Request:**

*"Please revise Section 9.0 Post Closure Plan as follows  
Modify Section 9.0 to specify the timeframe repairs will be made."*

**NVPP Request:**

Section 9.1 has been revised to specify that any erosion greater than 3 inches and less than 6 inches deep will be repaired within one week of identification. Deeper erosion will be isolated by diversion and containment structures to mitigate further erosion until a permanent repair is made within one month of the erosion having been identified.

**NDEP Request:**

*"Modify Section 9.2 to reference the Groundwater Monitoring program in Appendix 1."*

**NVPP Response:**

Section 9.2 has been modified to refer to the Groundwater Monitoring Plan in Appendix J.

**Detailed summary of changes made to the text of the revised application**

**Page 1: Replaces Page 1 in current application on file**

1.0 INTRODUCTION

The text has been amended to read "application to expand laterally and vertically, as well as to incorporate construction debris disposal into one Class III Landfill to allow closure of the waived construction debris landfill (SWMI-08-01).

2.1 North Valmy Site Description and Features

The reference to water being supplied from a "near-by gold mine" has been amended to read "approximately 20 groundwater wells located up to 15 miles east and southeast from the plant".

**Pages 2 and 3 (Figures 1 and 2) are unchanged from the application on file.**

**Page 4: Replaces Page 4 in current application on file**

2.5 Owner & Operator Data

The owner and operator data has been updated.

**Page 5: Replaces Page 5 in current application on file**

3.1 Site Description

References to the Unit 3 development and Unit 3 landfill have been removed.

**Page 6: Replaces Page 6 in current application on file**

3.2 Restrictions (4)

The description of the available cover soil volume on site and its organic content has been expanded from the original text.

3.2 Restrictions (7)

A sentence has been added to state that the "uppermost aquifer lies at a depth of greater than 100 ft beneath the landfill."

**Page 7: Replaces Page 7 in current application on file**

4.0 SOLID WASTE CHARACTERIZATION

An expanded description of solid wastes that will be placed in the landfill has been inserted. Off-site removal of municipal waste is specified. Reference is made to TCLP analyses of ash, pond sediment and construction waste material in an expanded Appendix C.

4.1 Fly Ash and Bottom Ash

A revised estimate of average weights and tonnages of fly ash and bottom ash is presented.

**Page 7 (addendum 1) this is an addendum to the replacement Page 7**

4.1 Fly Ash and Bottom Ash

TCLP test methods and analytes are specified.

4.2 Evaporation Pond Solids

A description of pond sediment, proposed for placing in the landfill is inserted. This section contains estimates of tonnage and volume, handling and testing procedures. The proposed location of pond sediment in the expanded landfill is referred to in a revised Figure 3.

4.3 Industrial Solid Waste

A description of industrial solid waste (previously "construction waste") is inserted. This section contains estimates of tonnage, volume and testing procedures. The proposed location of industrial solid waste in the expanded landfill is referred to in a revised Figure 3.

**Page 7 (addendum 2) this is a second addendum to the replacement Page 7**

Continuation of section 4.3.

**Page 8: Replaces Page 8 in the current application on file**

4.4 Waste Stream Assurance

This section has been revised to be consistent with training activities employed at the site.

5.0 LANDFILL DESIGN

The reference to "fly ash and bottom ash" landfill has been replaced with "Class III landfill". The potential for run-on and run-off at the landfill is described in greater detail than in the original. Reference to the NVPP Stormwater Pollution Prevention Plan (SW3P) is made.

**Page 9: Replaces Page 9 in the current application on file**

5.3 Site Life

The life of the proposed expanded landfill is discussed in this section. The current (2010) stored volume and estimated available storage capacity is summarized.

5.4 Configuration

The estimated areas of the currently permitted and proposed expanded landfill are presented. The estimate of the area of the currently permitted landfill (from AutoCAD drawings) corrects an error in earlier submissions.

**Page 10: The revised Figure 3 replaces that in the current application on file.**

**Page 11: The revised Figure 4 replaces that in the current application on file.**

**Page 12: Replaces Page 12 in the current application on file.**

5.6 Access and Site Control

The duration of controlled entry to the plant is increased from 8 to 12 hours per day.

5.7 Waste Stream Characterization

The estimated tonnage, volume and sources of waste material proposed for storage in the landfill has been expanded to include pond sediment and industrial solid ("construction") waste.

**Page 12 (addendum 1): this is an addendum to the replacement Page 12.**

5.8 Protection of the Waters of the State

This section is placed on an addendum page to accommodate the expanded section 5.7.

**Page 13: Unchanged.**

**Page 14: Replaces Page 14 in the current application on file.**

5.8.3 Field Investigations

This section has been expanded to describe field investigations done in 2009 through 2011 and to summarize key findings.

**Page 15: Unchanged.**

**Page 16: Unchanged.**

**Page 17: Unchanged.**

**Page 18: Unchanged.**

**Page 19: Replaces Page 19 in the current application on file.**

5.8.5 Leachate

The original second sentence stating "that some leachate would be held within the landfill waste" has been removed.

5.9 Surface Water Control

A paragraph stating that the landfill is not subject to run-on drainage and that runoff is captured by diversion ditches and routed to a retention basin and to the evaporation ponds has been inserted.

**Page 20: Replaces Page 20 in the current application on file.**

5.10 Cover Material

A sentence specifying the thickness and timing of placement of intermediate cover has been inserted into the first paragraph.

5.11 Sloping

The grades of the final top and side slopes of the completed landfill have been specified.

## 6.0 WATER QUALITY MONITORING

The current monitoring well network is referenced. Proposed future changes to the monitoring well network are outlined.

### **Page 21: Replaces Page 21 in the current application on file.**

#### 7.1 Equipment

A sentence specifying that the water truck for dust control will be augmented by a pipeline supplied sprinkler system, as required, has been added.

#### 7.2 Personnel

References to training activities at the site have been revised in line with actual practice. The designated landfill operation personnel, with their responsibilities have been added to the text.

### **Page 22: Replaces Page 22 in the current application on file.**

#### 7.2 Personnel

The NVPP point of contact information has been updated.

#### 7.3 Fire Control

This section has been expanded to describe:

- Fire protection training given to site personnel
- The principal external responder to a fire emergency that could not be contained by NVPP personnel (Valmy VFD).
- Secondary support fire departments.
- Operational practices that would prevent combustible material from being placed in the landfill.
- The site specific emergency fire control plan (referenced in Appendix I).

### **Page 22 (addendum) this is an addendum to the replacement Page 22.**

#### 7.5 Prevention of Hazardous Substance Releases

This section is unchanged. It has been placed in an addendum page to accommodate the expanded section 7.3.

#### 7.6 Compacted Waste Cover

Reference to 100-ft borrow lanes has been replaced by "borrow pit", in line with practice at the site.

### **Page 23: Replaces Page 23 in the current application on file.**

#### 7.7 Final Cover

The first paragraph has been rewritten to specify cover thickness, lateral extent and final top and side slope grading.

#### 7.8 Erosion Control

This section has been rewritten to specify the response to specific erosion events.

#### 7.9 Signs

This section has been rewritten to refer to the Class III landfill, rather than the ash landfill. Reference is also made to specified waste streams, rather than ash waste only.

### **Page 24: Replaces Page 24 in the current application on file.**

#### 7.10 Inspections and Record Keeping

The inspection frequency specified has been amended to weekly visual inspections by landfill personnel and monthly by environmental and engineering personnel during the operating life of the landfill.

#### 7.12 Access and Operational Hours

The specified normal hours of operation have been amended in line with actual practice at the site.

#### 8.0 CLOSURE PLAN

A sentence stating that "NV Energy reserves the right to amend its Class III landfill capacity if it needs to continue operation of the NVPP beyond the current expected life" has been added.

Sections 8.1 (Actions) and 8.2 (Final Cover) have been expanded and moved onto page 25.

#### **Page 25: Replaces Page 25 in the current application on file.**

##### 8.1 Actions

An expanded section, which specifies actions and their timing, has been inserted in place of the original section.

##### 8.2 Final Cover

This section has been expanded to describe the thickness, lateral extent and grading of the final cover. The frequency of visual inspections during the operating life of the NVPP is specified.

#### **Page 25 (addendum 1) this is an addendum to the replacement Page 25.**

The intention of NV Energy to use on-site soils, augmented by imported material, if necessary, to meet the maximum hydraulic conductivity requirement for final cover materials is stated.

##### 8.3 Waste Volume and Area Estimations

This section has been revised to reflect current estimates of annual waste generation rates and final I and fill volumes.

##### 9.1 Inspections

Reference to State requirements (NAC 444.6894) has been added to the first paragraph.

#### **Page 25 (addendum 2) this is a second addendum to the replacement Page 25.**

##### 9.1 Inspections (continued)

Text describing the frequency of cover integrity inspections and the response to specific erosion events has been added to this section.

##### 9.2 Water Monitoring

This section has been rewritten to refer to the revised groundwater monitoring plan.

#### **Page 26: Replaces Page 26 in the current application on file.**

#### 10.0 SUMMARY AND CONCLUSIONS

The final sentence of the fourth paragraph, which stated that, "the landfill was unlikely to create an environmental hazard or threaten the health of the general public", has been removed as unnecessary.

#### **Page 27: Replaces Page 27 in the current application on file.**

#### 11.0 REFERENCES

Schlumberger Water Services, 2011 – Revised groundwater monitoring plan reference has been added.

**Figure 3: Replaces Figure 3 (Page 10) in the current application on file.**

Amended to remove proposed future diversion drains and retention basin and to show location of well LF-4R.

**Figure 4: Replaces Figure 4 (Page 11) in the current application on file.**

Amended to remove proposed future diversion drains and retention basin and to show location of well LF-4R.

**Appendix A, B, D, E, F, G, and H are Unchanged from current application on file (March 2001)**

**Appendix A: Specific to this Memoranda**

Water Chemistry data

**Appendix C: Replaces Appendix C in the current application on file.**

Recent TCLP analyses of fly ash, bottom ash, pond sediment and typical industrial solid waste have been added to the original list of fly ash and bottom ash analyses.

**Appendix I: New appendix added in response to NDEP requests.**

The NVPP site fire emergency response plan has been added.

**Appendix J: New appendix added in response to NDEP requests.**

The revised groundwater monitoring plan (SWS, 2011) has been added.

Jon Taylor

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From: Steve Carroll <SCarroll2@slb.com>  
Sent: Thursday, October 06, 2011 9:29 AM  
To: Jon Taylor  
Subject: NV Energy North Valmy Class III landfill expansion amendment - requested change to Appendix D

MR. TAYLOR,

FURTHER TO OUR DISCUSSION ABOUT REVISIONS TO THE NV ENERGY APPLICATION TO EXPAND THE CLASS III LANDFILL AT THE NORTH VALMY POWER PLANT SITE, I CAN SUPPLY THE ADDITIONAL CLARIFICATION THAT YOU REQUESTED:

1) NDEP COMMENT - AT THE MEETING BETWEEN NDEP AND NV ENERGY ON AUGUST 25, 2011, IT HAD BEEN REQUESTED THAT APPENDIX D OF THE APPLICATION DOCUMENT (DRILLER'S LOGS) SHOULD CONTAIN ONLY LOGS FOR THE LANDFILL WELLS THAT ARE USED AS MONITORING WELLS FOR THE SITE.

2) NV ENERGY RESPONSE - NV ENERGY'S CONSULTANT MODIFIED APPENDIX D OF THE APPLICATION TO CONTAIN ONLY LANDFILL MONITORING WELLS. PAPER COPIES OF THE RELEVANT WELL LOGS (LF-1R, LF-2R, LF-3R, LF-4R AND LF-5) WERE DELIVERED TO NDEP ON OCTOBER 5, 2011. THE PAPER COPIES DELIVERED AT THAT TIME WILL REPLACE THE CONTENTS OF APPENDIX D IN THE APPLICATION CURRENTLY ON FILE.

PLEASE CONTACT ME IF ANY ADDITIONAL CLARIFICATION IS NEEDED.

THANK YOU.

STEVE CARROLL  
SENIOR HYDROGEOLOGIST  
(CONSULTANT TO NV ENERGY)

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