



July 30, 2026

ATTN: Zack Carter/ Bureau of Water Quality Planning
Nevada Division of Environmental Protection
Department of Conservation and Natural Resources
9805 Double R Blvd., Suite 200
Reno, Nevada 89521

SUBJECT: Request for Section 401 Water Quality Certification for the Approximately 31.5-Mile Ivanpah Underground Waterline and 69KV Overhead Powerline Rights-of-Way Project, Located Partially in Clark County, Nevada

Dear Mr. Carter:

On behalf of our client, Castle Mountain Venture, (Applicant), GLA is submitting the enclosed application for Section 401 Water Quality Certification for temporary impacts to potential waters of the U.S. associated with the 31.5-Mile Ivanpah Underground Waterline and 69KV Overhead Powerline Rights-of-Way Project (Project), partially located partially in Clark County, Nevada. The Project consists of the construction of an underground water transmission pipeline and overhead electrical transmission line to provide water and power resources necessary to support the Castle Mountain Mine Phase II Expansion Project.

The Project will result in temporary impacts to 3.78 acres (9,523 linear feet) of potential non-wetland interstate waters of the U.S, all of which is subject to Nevada Department of Environmental Protection (NDEP) jurisdiction. Approximately 14,761 cubic yards of clean fill material will be temporarily displaced during construction.

A request for a pre-application meeting was submitted by email to the Nevada Department of Environmental Protection (NDEP), the California Regional Water Quality Control Boards (RWQCBs), and the U.S. Army Corps of Engineers (Corps), and the on April 30, 2026 (enclosed). A pre-application coordination meeting was subsequently conducted on May 12, 2026, with representatives of the NDEP, RWQCBs, and Corps. Discussions focused on the proposed project, jurisdictional aquatic resources, and applicable federal and state permitting requirements.

1.0 OTHER AGENCY AND ENVIRONMENTAL REVIEW

A pre-construction notification (PCN) for authorization under Nationwide Permit 58 is being submitted concurrently to the Corps.



A request for RWQCB Section 401 Water Quality Certification for activities in California is being submitted concurrently to the State Water Resources Control Board (SWRQB).

A California Department of Fish and Wildlife (CDFW) Section 1602 Lake and Streambed Alteration Notification will be submitted to CDFW.

A Temporary Working in Waters Permit for activities in Nevada will be submitted the NDEP.

State Clearinghouse (SCH) No. 2025100846 (Castle Mountain Mine Phase II Expansion Project) is currently undergoing environmental review under the California Environmental Quality Act (CEQA) by the County of San Bernardino, serving as Lead Agency, in coordination with the U.S. Bureau of Land Management (BLM). The Draft Environmental Impact Report (EIR)/Joint Document was submitted to the State Clearinghouse on April 17, 2026, and the public review period concluded on June 1, 2026. Based on the current project schedule, certification of the Final EIR is anticipated in late 2026 or early 2027.

Please find attached the following:

- A. NDEP 401 Application Form
- B. Application Form - Section C Additional Information Page and Exhibits

The following enclosures accompany this application and are being provided electronically:

1. Water Pipeline Construction Activities Report [Appendix A]
2. Equinox Typical Construction Details [Appendix B]
3. Reclamation and Restoration of Pipeline ROW Report [Appendix C]
4. Utilities Plan of Development (Trinity Consultants/Westland, 2025) [Appendix D]
5. Jurisdictional Delineation Report (GLA, 2025) [Appendix E]
6. Request for Approved Jurisdictional Determination Materials [Appendix F]
7. Biological Survey Report (GLA, 2024) [Appendix G]
8. Draft Environmental Impact Report (SCH No. 202510084) [Appendix H]
9. BLM NEPA Phase II and ROW Technical Studies and Other Documents [Appendix I]
10. Corps Section 404 NWP 58 Pre-Construction Notification [Appendix J]
11. Application for RWQCB Section 401 Water Quality Certification [Appendix K]

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If you have any questions regarding this application for Section 401 Water Quality Certification, please contact me at 949.340.3968 or by email at llokovic@wetlandpermitting.com.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Lokovic-Gamber".

Lesley Lokovic-Gamber
Principal Senior Regulatory Specialist

p:1359-1a.NDEP.401.letter



ATTACHMENT A

APPLICATION FOR SECTION 401 WATER QUALITY CERTIFICATION



ATTACHMENT B

SECTION C ADDITIONAL INFORMATION PAGE AND EXHIBITS

NDEP Section 401 Water Quality Certification Application – Additional Information Sheet

**Project: Ivanpah Underground Waterline and 69kV Overhead Powerline Project
Associated with Castle Mountain Mine**

C. PROJECT GENERAL INFORMATION

Project Location

The Ivanpah Underground Waterline and 69-kV Overhead Powerline Rights-of-Way Project for Castle Mountain Mine consists of an approximately 31.5-mile underground water transmission pipeline and an approximately 16.5-mile overhead electrical transmission line (collectively, the Utilities Right-of-Way [ROW]) that extends from private land near Nipton, California east along Highway 164 to Walking Box Ranch Road, then extends south along Walking Box Ranch Road to the limits of the Castle Mountain Mine property. Land adjacent to the Project site along Highway 164 consists of undeveloped land managed by the U.S. Bureau of Land Management (BLM) within California and Nevada [Exhibit 1 – Regional Map].

The Utilities ROW is within Sections 20, 24, 25, 26, 29, 30, 31, Township 16N, 28S, 15N, 29S, and Range 16E, 17E, 60E, 61E, 62E as depicted on the U.S. Geological Survey (USGS) topographic maps Crescent Peak, Hart Peak, Highland Spring, Hopps Well, McCullough Mountain, and Nipton, California—Nevada [Exhibit 2 –Vicinity Map] and is located on a combination of private lands, unpatented mining claims, and public lands administered by the BLM, including lands managed by the BLM Las Vegas Field Office in Nevada and the BLM Needles Field Office in California. To minimize new surface disturbance, the proposed utilities are sited primarily within existing utility, transportation, and access-road rights-of-way.

This application is limited to the portion of the utility corridor located within Nevada and subject to the jurisdictions of the Nevada Division of Environmental Protection (NDEP). The application area includes approximately 10.23 miles of underground waterline and 7.45 miles of overhead powerline within Clark County, Nevada, and will result in approximately 182 acres of land disturbance in Nevada. The utility corridor traverses remote Mojave Desert terrain characterized by alluvial fans, rocky uplands, and ephemeral desert washes that drain to Ivanpah Dry Lake and the Colorado River. This application encompasses only the Nevada portion of the Utilities ROW associated with the Castle Mountain Mine Phase II Expansion Project.

The Nevada portion of the Project is located in Clark County and traverses portions of APNs: 241-29-099-001; 241-22-099-001; 241-20-099-001; 242-00-002-007; 241-20-000-003; 240-25-099-001; 241-13-099-001; 241-14-099-001; 241-30-099-001; 242-00-099-001; 242-00-099-002; 241-15-099-001; 241-21-099-001; 240-26-000-002; 242-00-002-016; 253-00-001-007; 242-00-002-017; 240-25-000-002; 241-21-000-002; 242-00-002-006; 241-30-000-002; 242-00-001-020; 242-00-002-004; 241-14-000-002; 241-13-000-002; 241-22-000-002; 241-29-000-002; 242-00-002-015; 251-00-002-013; 251-00-002-014; 251-00-001-017; 251-00-002-001; 251-00-002-011; 251-

00-002-012; 242-00-002-023; 251-00-002-002; 251-00-001-004; 251-00-001-009; and 251-00-001-008.

These parcels include a combination of private lands and lands subject to federal administration by BLM.

Name of Receiving Water Body: Unnamed tributaries to Ivanpah Dry Lake and the Colorado River

Project Coordinates:

Table 1-1. Project Site Boundary Coordinates

Latitude	Longitude	State
35.464608	-115.277530	CA
35.467887	-115.275137	CA
35.468741	-115.269011	CA
35.471210	-115.255458	CA
35.473451	-115.242158	CA
35.476043	-115.226798	CA
35.370520	-115.092570	NV
35.480227	-115.204312	NV
35.485732	-115.183292	NV
35.490932	-115.167044	NV
35.500141	-115.148443	NV
35.511671	-115.135988	NV
35.514754	-115.102440	NV
35.514130	-115.079436	NV
35.500786	-115.035929	NV
35.489180	-115.042638	NV
35.484263	-115.034312	NV
35.470402	-115.049333	NV
35.445457	-115.060540	NV
35.430762	-115.067418	NV
35.404714	-115.079900	NV
35.397695	-115.085478	NV
35.386791	-115.079832	NV
35.381999	-115.082145	NV
35.364021	-115.099844	CA
35.348119	-115.107690	CA
35.336603	-115.102052	CA
35.328455	-115.101761	CA
35.317213	-115.110804	CA
35.311107	-115.115846	CA
35.302139	-115.121724	CA

35.296250	-115.124302	CA
35.275844	-115.122718	CA

PROJECT DETAILS

Project Purpose

The purpose of the proposed project is to develop utility infrastructure that provides a reliable long-term water supply and electrical transmission service necessary to support existing and planned industrial operations for the Castle Mountain Mine Phase II Expansion. The project is intended to convey groundwater and deliver electrical power to facilities requiring additional utility capacity while minimizing impacts to waters of the U.S. and other environmentally sensitive resources through the use of existing rights-of-way and previously disturbed corridors where practicable.

The overall goal of the project is to construct an underground water transmission pipeline and overhead electrical transmission line to provide the water and power resources necessary to support the Castle Mountain Mine Phase II Expansion Project while avoiding and minimizing impacts to waters of the U.S. to the maximum extent practicable. The project has been designed to utilize existing utility and transportation corridors, limit disturbance within jurisdictional waters and drainages, restore all temporary drainage impacts to pre-construction contours and hydrologic function, and confine permanent impacts to upland areas outside waters of the U.S. Through these measures, the project seeks to provide the infrastructure needed to support long-term mine operations while maintaining drainage connectivity, flow conveyance, and aquatic resource functions and values

Current Site Conditions:

The approximately 31.5-mile utility corridor/Project site extends from the vicinity of Nipton, California, east along Highway 164 for approximately 14 miles to Walking Box Ranch Road, then south along Walking Box Ranch Road for approximately 16 miles. The corridor generally follows existing transportation and utility routes, including Highway 164, Walking Box Ranch Road, the Castle Mountain Mine Access Road, and other previously disturbed linear features. The Project site is located within the historic Castle Mountains mining region and consists primarily of BLM-administered public lands, with limited areas of private ownership. Existing disturbances within and adjacent to the corridor include roadways, utility corridors, mining infrastructure, and areas previously disturbed by exploration and mining activities.

The Project area is situated within the eastern Mojave Desert and is characterized by gently sloping alluvial fans, rocky foothills, and ephemeral drainage systems. Ground elevations range from approximately 3,009 feet above mean sea level (AMSL) near Nipton to approximately 4,822 feet AMSL at the highest point along Highway 164.

This corridor is largely disturbed and developed along existing transportation and utility routes, with aquatic resources limited to ephemeral desert drainages that cross the proposed alignments. Surface waters within the corridor are limited to ephemeral washes and desert drainages that convey flow only in response to precipitation and runoff events. Several drainage features crossed by the proposed utility alignments are considered potential interstate waters of the U.S. These features generally consist of unvegetated or sparsely vegetated channels with sandy, gravelly, and cobble substrates.

Vegetation within the corridor is typical of the eastern Mojave Desert and is dominated by blackbrush scrub, with scattered eastern Joshua tree woodland. Other common species include creosote bush, white bursage, and other native desert shrubs and annual plants. Mapped soils within the utility right-of-way consist of several desert soil associations and complexes, including Lanfair-Hoppswell, Lanip-Kidwell, Lecyr, Helendale-Caruthers-Castaneda, Hoppswell-Ustidur, Hartpeak-Highland, Minehart, Nippeno-Newera, and Paskha-Arizo soils. These soil types are characteristic of arid desert landscapes and include soils associated with ephemeral wash systems.

Refer to the Project's Jurisdictional Delineation Report (GLA, 2025) and Biological Survey Report (GLA, 2024) for details.

Project History

CMM is an existing open-pit and heap-leach gold mining operation located in the historic Hart Mining District of eastern San Bernardino County, California, approximately 60 miles south of Las Vegas, Nevada. The mine is situated on a combination of private land owned by CMV and public lands administered by the BLM Needles Field Office. Mining activities at the Hart Mining District have occurred intermittently since the early 1900s, with modern large-scale mining operations authorized under a BLM-approved Plan of Operations and associated environmental review completed in 1990.

In recent years, CMV has redeveloped and proposed expanded mining operations at the site to access additional mineral resources within the approved mine plan area. To support continued production and long-term operation of the mine, CMV has proposed the Castle Mountain Mine Phase II Expansion Project. The Phase II Expansion is intended to increase annual mining and ore-processing rates, extend the productive life of the mine by approximately 30 years, and recover

additional proven and probable gold reserves within the existing mining approved project area (APA). The proposed expansion includes enlargement of mine facilities within the APA together with construction of new utility infrastructure necessary to meet the project's increased water and power demands.

The Phase II Expansion would increase water demand to approximately 2,250 acre-feet per year and electrical demand to approximately 25 megawatts. To meet these needs, Castle Mountain Venture (CMV) proposes to construct an approximately 31.5-mile-long underground water transmission pipeline and an approximately 16.5-mile-long 69-kV overhead transmission line extending from existing utility infrastructure near the Walking Box Ranch area in Clark County, Nevada, to the Castle Mountain Mine in California.

Historically, the mine received electrical service from the regional (Nevada) power grid through a transmission line that was removed in 2011 during reclamation of prior mining operations. The proposed 69-kV powerline would restore grid-supplied electrical service generally within a previously disturbed utility corridor. The proposed water pipeline would be similarly constructed primarily within existing utility and transportation corridors to minimize environmental impacts. The utility corridor generally follows existing access routes, including the Castle Mountain Mine Access Road, which would be used where practicable for construction and maintenance activities, further limiting surface disturbance.

Project Description Details

CMV proposes to construct an underground water transmission pipeline and an overhead electrical transmission line to support the CMM Phase II Expansion Project in eastern San Bernardino County, California. The utility facilities are a component of the larger Phase II Expansion Project currently undergoing environmental review pursuant to the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). San Bernardino County is the CEQA state lead agency. As related actions, the environmental effects from the utility facilities are being analyzed in the same joint NEPA Environmental Impact Statement (EIS) and CEQA Environmental Impact Report (EIR). The expansion would increase mining and ore-processing rates and extend the mine life by approximately 30 years, requiring additional water and electrical supply infrastructure.

To support expanded mining operations, CMV proposes to construct an approximately 31.5-mile-long underground water pipeline extending from the Walking Box Ranch area in Clark County, Nevada, to the mine site in California, and an approximately 16.5-mile-long 69-kilovolt (kV) overhead transmission line connecting existing electrical infrastructure in Nevada to the mine [Exhibit 3 – Project Map]. The utilities would be located primarily within existing utility, transportation, and access-road rights-of-way on lands administered by the BLM in Nevada and California to minimize environmental disturbance and avoid the creation of new utility corridors.

Construction of the pipeline and transmission line would require crossings of ephemeral desert washes, some of which may be subject to federal and/or state jurisdiction under the Clean Water Act and Porter-Cologne Water Quality Control Act. Consequently, the project requires authorization from the U.S. Army Corps of Engineers (Corps) under Section 404 of the Clean Water Act and corresponding NDEP Section 401 Water Quality Certification for activities occurring within waters

of the U.S. A separate application for a NDEP Temporary Working in Waters Permit will be submitted at a later date to address impacts to waters of the State.

Underground Waterline

Under the proposed Project, CMV would construct, operate, and maintain an approximately 31.5-mile-long underground water pipeline to convey groundwater from private wells in the unadjudicated Ivanpah Basin to the CMM. The pipeline would cross San Bernardino County, California, and Clark County, Nevada, traversing approximately 31 miles of BLM-administered lands and approximately 0.5 mile of private lands. The proposed alignment generally parallels existing transportation corridors, including the CMM Access Road and Nevada State Route 164, and avoids entry into the Mojave National Preserve. The pipeline would terminate within the approved CMM mine boundary.

Pipeline construction would consist of trench excavation, pipe installation, backfilling, and site restoration. The trench would be excavated to a depth of approximately 6 feet and a width of approximately 30 inches and would accommodate the installation of a 10-inch-diameter steel and high-density polyethylene (HDPE) pipeline. Following installation, excavated materials would be returned to the trench, topsoil would be redistributed, and disturbed areas would be revegetated and stabilized in accordance with BLM requirements and approved reclamation measures.

CMV is requesting short-term and long-term BLM ROWs for construction, operation, maintenance, and reclamation of the pipeline. During construction, the total disturbance corridor would be approximately 65 feet wide. Following construction, temporary work areas would be reclaimed and the short-term ROW relinquished.

The pipeline alignment crosses several interstate ephemeral drainage features that may qualify as waters of the U.S. Construction within these features would consist of temporary trenching and backfilling to install the buried pipeline. Following construction, affected washes and drainage features would be restored to preconstruction contours and drainage characteristics. No aboveground structures, permanent fill, channel modifications, flow diversions, or other permanent encroachments within jurisdictional waters are proposed. As a result, impacts to waters associated with pipeline installation would be temporary in nature, and no permanent loss of waters of the U.S. would occur.

Upon closure of the facility, the pipeline would be drained, sealed, left in place below grade, and all associated surface facilities would be removed. Disturbed areas would be reclaimed to approximate preconstruction conditions in accordance with the approved reclamation plan.

Implementation of the Ivanpah Water Pipeline would result in temporary impacts to jurisdictional waters associated with trench excavation and backfilling at drainage crossings, as well as temporary and long-term disturbance to adjacent upland habitats within the ROW. Avoidance and minimization measures, best management practices (BMPs), erosion and sediment controls, and reclamation requirements identified in the Plan of Operations (POD) would be implemented to minimize effects on water quality and aquatic resources and to restore temporarily disturbed waters and uplands

following construction. Because the pipeline would be buried and all affected drainage features and access areas would be restored to pre-project contours and hydrologic conditions, the project would not result in permanent changes to drainage patterns, watershed hydrology, flood conveyance, flow characteristics, or the extent of waters of the U.S.

Overhead Powerline

Under the proposed Project, CMV would reestablish a 69-kV overhead powerline to provide grid-supplied electricity to mine facilities. The powerline would extend approximately 16.5 miles across BLM-administered lands in San Bernardino County, California (approximately 7.2 miles), and Clark County, Nevada (approximately 9.3 miles), generally following the route of a previously authorized and subsequently removed powerline. The alignment would terminate at the proposed electrical substation within the approved CMM APA. CMV is requesting a long-term BLM ROW approximately 100 feet wide and a temporary construction ROW for installation activities. The powerline would consist of approximately 272 wood poles spaced an average of 300 feet apart, with heights ranging from approximately 52 to 70 feet. Construction would involve installation of poles, conductors, shield wires, and fiber-optic communication lines in accordance with National Electrical Safety Code (NESC) standards.

The powerline has been designed to avoid waters of the U.S. to the maximum extent practicable. All poles, anchors, and other permanent support facilities would be located in upland areas outside jurisdictional drainages. Where necessary, longer spans and taller poles would be used to cross wider drainages without placing structures within channels. Consequently, no permanent fill, grading, foundations, or other permanent facilities would be installed within jurisdictional waters.

Conductor and fiber-optic lines would be installed using overhead stringing methods that minimize ground disturbance. Following pole installation, cables would be pulled between poles using trucks, bucket trucks, and, where access is constrained, hand-placed ropes. These activities would not require excavation or permanent disturbance within drainages.

Following construction, all temporary work areas would be reclaimed in accordance with the ROW Plan of Development (POD). Future closure activities would include removal and recycling of conductors and fiber-optic lines, removal of ancillary equipment, and reclamation of disturbed areas.

The proposed powerline would result primarily in temporary and long-term disturbance within upland portions of the ROW. Any temporary disturbance occurring near jurisdictional drainages would be limited to conductor-stringing activities and, where applicable, would occur within the same construction alignment and disturbance footprint established for the Ivanpah Water Pipeline. Because all permanent powerline facilities would be located outside jurisdictional waters and drainage channels, no permanent impacts to waters of the U.S. would occur. Avoidance measures, best management practices, and reclamation requirements would be implemented to protect water quality and restore any temporarily disturbed areas following construction.

Equipment

Pipeline and powerline construction equipment generally includes trucks, dozers, graders, excavators, backhoes, trenchers, side-booms, bending machines, trailers, diggers, welding and testing supplies, and directional drill boring equipment. Additional powerline construction equipment includes small mobile cranes, drill rigs with augers, pullers and tensioners, air compressors, air tampers, and concrete trucks.

Project Schedule

Construction of the proposed utility facilities would commence following receipt of all required federal, state, and local approvals, with construction anticipated to begin as early as Fall 2027. Utility construction activities would include survey and staking, pre-construction environmental surveys, access preparation, trench excavation and backfilling for the water pipeline, pole installation and conductor stringing for the powerline, equipment mobilization, and worker and vendor travel to and from the Project area. All construction activities conducted by CMV and its contractors would occur within the approved limits of disturbance and authorized ROWs.

Construction support would require up to five temporary staging areas for equipment storage, materials stockpiling, and contractor operations. These staging areas would be located within approved ROWs between the CMM and Nipton, California. CMV would coordinate with the BLM to ensure staging, access, and construction activities remain within authorized disturbance footprints. Upon completion of construction, all temporary staging areas on public lands would be reclaimed in accordance with approved reclamation and restoration requirements.

Construction of the Ivanpah Water Pipeline is anticipated to occur over an approximately 18-month period. Construction activities would include trench excavation, pipeline installation, backfilling, testing, and restoration of temporarily disturbed areas. Temporary construction disturbance associated with the pipeline would occur within short-term and long-term ROWs encompassing approximately 51.2 acres of public land and 1.7 acres of private land. These temporarily disturbed areas would be reclaimed upon completion of construction. Long-term operation of the buried pipeline would occur within a narrower permanent ROW encompassing approximately 22.7 acres of public land and 0.80 acre of private land.

Construction of the 69-kV powerline is anticipated to occur over an approximately 12-month period and may occur concurrently with portions of pipeline construction. Activities would include installation of pole structures, conductor and fiber-optic line stringing, and associated access and reclamation activities. The powerline has been designed to avoid placement of poles, anchors, and other permanent facilities within drainages and jurisdictional waters. Temporary disturbance associated with conductor stringing near drainage crossings would be minimized and, where applicable, would occur within the same construction corridor established for the water pipeline. Temporary disturbance associated with powerline construction would encompass approximately 2.6 acres of public land within short-term work areas, which would be reclaimed following construction. Long-term powerline facilities would permanently occupy approximately 0.40 acre of public land associated with pole locations and related infrastructure.

Following utility construction, all temporary work areas, access routes not required for operations, and staging areas would be restored and reclaimed in accordance with the approved reclamation plan, while permanent utility facilities would remain in operation for the life of the Project.

Nature of Direct Impacts

The Project will result in temporary impacts to approximately 3.78 acres (9,523 linear feet) of non-wetland ephemeral interstate waters of the U.S., none of which is wetland.

Construction of the Project would result in temporary direct impacts to waters of the U.S. here the buried pipeline crosses desert washes and drainage features. Direct impacts would consist of trench excavation, pipe installation, backfilling, equipment operation, and short-term disturbance of channel substrates and banks within jurisdictional features. Similarly, temporary construction activities associated with the 69-kV powerline, including conductor stringing and access near drainage crossings, could result in minor short-term disturbance adjacent to jurisdictional waters; however, all poles, anchors, and permanent support facilities would be located in uplands outside jurisdictional drainages. No permanent fill, channelization, bank stabilization, flow diversions, or other permanent encroachments within waters of the U.S. or waters of the State are proposed.

Table 3-2 below provides temporary impacts to waters of the U.S. by drainage feature.

Table 3-2. Temporary Impacts to Waters of the U.S. in Nevada

Drainage	Non-Wetland Waters of the U.S. (acres)	Wetland Waters of the U.S. (acres)	Total (acres)	Length (lf)
22	0.54	0	0.54	3,299
54	3.22	0	3.22	6,012
155	0.02	0	0.02	212
Total*	3.78	0	3.78	9,523

*sum of individual parts may differ from total sum due to rounding error

Nature of Indirect Impacts

Indirect impacts to waters of the U.S. could occur through construction-related erosion, sediment transport, accidental releases of fuels or lubricants, soil compaction, vegetation removal within the right-of-way, increased runoff from disturbed soils, and the temporary introduction of fine sediments into adjacent drainage features. Construction traffic, equipment staging, stockpiling, and worker activities could also increase the potential for pollutants to be mobilized during storm events if not responsibly managed. However, the project has been designed to avoid permanent disturbance within jurisdictional drainages, and no permanent changes to drainage patterns, watershed hydrology, flood conveyance capacity, flow characteristics, groundwater-surface water interactions, or the acreage of waters of the U.S. would occur.

The project would implement construction BMPs, stormwater pollution prevention measures, erosion and sediment controls, reclamation requirements, and post-construction stabilization measures to ensure that disturbed areas are restored and that water quality objectives are maintained. Because the pipeline would remain buried, a previously proposed maintenance access road has been eliminated from consideration, drainage crossings would be restored to pre-project conditions, and powerline infrastructure would avoid jurisdictional waters entirely, indirect effects on hydrologic function and water quality would be localized, temporary, and less than significant following implementation of required avoidance, minimization, and restoration measures.

Appendix A (Water Pipeline Construction Activities Report) provides a detailed summary of construction activities, project sequencing, access and staging areas, construction equipment, and BMPs. Please note, the report describes a 10-foot unimproved maintenance access road above the buried pipeline. This is no longer a component of the project.

Appendix B (Equinox Typical Construction Details) provides typical construction specifications and details for the project.

Appendix C (Reclamation and Restoration of Pipeline ROW Report) provides details regarding restoration and reclamation of temporarily and permanently disturbed portions of the pipeline ROW.

Appendix D (Utilities Plan of Development) provides additional details regarding powerline construction activities.

Proposed Avoidance and Minimization Measures

All impacts to potential interstate waters of the U.S. are temporary and will be restored to pre-project contours following construction. A description of proposed mitigation measures to avoid and minimize impacts to waters is provided below.

The Project has been designed to avoid and minimize direct impacts to waters of the U.S. by limiting jurisdictional disturbances to temporary construction activities associated with installation of the underground Ivanpah Water Pipeline. Pipeline crossings of desert washes and drainage features would consist solely of trench excavation, pipe installation, and trench backfilling, with no permanent placement of fill, channel modifications, flow diversions, grade-control structures, bank armoring, or other permanent encroachments within jurisdictional waters.

Following installation, all drainage crossings would be restored to pre-construction contours, channel dimensions, and hydrologic conditions to maintain existing drainage functions and aquatic resource values. The 69-kV overhead powerline has likewise been designed to avoid direct impacts by locating all poles, anchors, and permanent support structures outside jurisdictional waters and drainage channels. Where drainage crossings occur, longer spans and taller poles would be used to ensure that no permanent facilities are placed within waters of the U.S..

To further minimize temporary direct impacts, construction activities would be restricted to approved rights-of-way and designated work areas, and jurisdictional features would be clearly demarcated prior to construction. Temporary disturbance areas would be maintained at the

minimum extent practicable, and construction activities within drainages would be completed as expeditiously as feasible. Equipment staging, material stockpiling, fueling, maintenance activities, and waste storage would occur outside jurisdictional waters wherever practicable. Following construction, disturbed areas would be stabilized, revegetated, and reclaimed in accordance with the approved reclamation plan and applicable water quality requirements. As a result, no permanent loss of waters of the U.S. would occur, and temporary impacts would be minimized and fully restored following project completion.

To avoid and minimize potential indirect impacts, the Project would implement all applicable water quality permit conditions, Stormwater Pollution Prevention Plan (SWPPP) requirements, National Pollutant Discharge Elimination System (NPDES) requirements, project-specific best management practices, as well as additional project stipulations applied by the state and federal lead agency authorizations. Erosion and sediment control measures would be installed prior to ground disturbance and maintained throughout construction to prevent sediment transport into adjacent drainage features. BMPs would include stabilization of disturbed surfaces and stockpiles, perimeter controls, stormwater management measures, spill prevention and response procedures, equipment inspection and maintenance requirements, proper material storage practices, and dust-control measures.

Indirect effects to hydrology and water quality would also be minimized through restoration of all temporary disturbance areas to pre-project elevations, contours, and drainage patterns. The buried pipeline would not alter surface flow characteristics, flood conveyance capacity, watershed boundaries, groundwater recharge functions, or long-term drainage conditions. In addition, the previously proposed pipeline maintenance access road has been eliminated, reducing the potential for long-term erosion, habitat fragmentation, and chronic sediment delivery. Permanent powerline facilities would remain outside jurisdictional waters, thereby avoiding indirect alterations to drainage channels and aquatic resources. Post-construction reclamation, revegetation, and monitoring would further stabilize disturbed areas and promote recovery of natural watershed functions. Consequently, indirect impacts to water quality, hydrologic processes, and beneficial uses would be temporary, localized, and minimized to the maximum extent practicable.

Site Design

The proposed utility facilities have been designed to minimize impacts to these drainage features. The underground water pipeline would be installed beneath drainage crossings, and disturbed areas would be restored following construction. The overhead powerline has been specifically designed to avoid placing poles, anchors, or other permanent support structures within drainage channels. Where necessary, longer spans and taller pole configurations may be utilized to maintain drainage avoidance.

The proposed Project incorporates site design BMPs intended to minimize impacts to water quality, aquatic resources, and natural drainage systems. Project design minimizes the area of disturbance by limiting clearing and grading to the minimum workspace necessary for safe pipeline installation. Existing drainage patterns and hydrologic connectivity will be maintained through the use of culverts, temporary crossings, and restoration of pre-construction contours.

Topsoil will be salvaged and replaced following construction to preserve soil productivity and facilitate revegetation. Permanent erosion-control features, including slope breakers and terraces, will be installed where necessary on sloping terrain to reduce runoff velocities and prevent long-term erosion. Disturbed areas will be restored to pre-construction grades and stabilized through seeding, mulching, and revegetation. Drainage channels crossed by the project will be restored to their original profiles and hydrologic function following installation activities.

Additional pollution prevention measures include setbacks for fueling and materials storage from aquatic resources, implementation of spill prevention and materials management plans, preservation of vegetation where feasible, and maintenance of natural drainage pathways to ensure post-construction hydrologic conditions are substantially equivalent to pre-construction conditions.

Construction BMPs

Construction BMPs will be implemented throughout all phases of pipeline construction to minimize erosion, sediment transport, pollutant discharge, and impacts to waters of the U.S. and State. BMPs will be installed, monitored, maintained, and modified as necessary by the project Environmental Inspector (EI) in accordance with the project's Stormwater Management Plan (SWMP) and applicable permit requirements.

Erosion and Sediment Control

Disturbance associated with construction activities will be minimized by limiting clearing and grading to the minimum area necessary for safe and efficient construction. Existing vegetation will be preserved where practicable, particularly within riparian areas and environmentally sensitive locations.

A combination of erosion-control and sediment-control BMPs will be implemented based on site-specific conditions, including slope, soil characteristics, drainage features, and anticipated runoff volumes. BMPs may include:

- Fiber rolls or sediment control logs (wattles)
- Silt fencing
- Straw bale barriers
- Rock check dams
- Sediment traps and sediment basins
- Temporary and permanent slope breakers
- Terraces
- Erosion control blankets (ECB)
- Velocity dissipation devices at culverts, drainages, and discharge locations
- Temporary stabilization measures for disturbed soils and slopes

Permanent and temporary slope breakers will be installed on sloping terrain to intercept runoff, reduce flow velocity, and prevent erosion along the construction right-of-way. Erosion control blankets consisting of biodegradable natural fiber materials will be used where appropriate,

particularly on slopes exceeding 33 percent. Mulch may be used on less steep slopes to promote stabilization and revegetation.

Drainage and Watercourse Protection

Construction activities within drainages will be conducted in a manner that minimizes impacts to water quality and hydrologic function. Where streamflow is present, flume crossings, dry-ditch crossing methods, or other stream isolation techniques may be employed to maintain flow while construction activities occur. Trenching and backfilling activities within drainage crossings will generally be completed within 24 hours where feasible.

Stockpiled soils and topsoil will be located away from stream channels and riparian areas. Existing drainage pathways will be maintained throughout construction to prevent ponding, flooding, or diversion of flows. Following construction, drainage features will be restored to pre-construction contours and conditions.

Dewatering and Non-Stormwater Management

If groundwater or stormwater is encountered during trench excavation, dewatering will be conducted using portable pumps. Dewatered water will be discharged in a manner that prevents erosion, flooding, and sediment transport. Filter bags and other sediment filtration devices will be utilized as necessary at discharge locations to remove suspended sediments prior to discharge. Any dewatering activities will comply with applicable permit requirements.

Hydrostatic testing water will be contained, recycled into frac tanks, and properly disposed of by qualified contractors. Test water will not be discharged to the ground surface unless specifically authorized under applicable permits.

Construction Entrance and Tracking Controls

Temporary access pads, vehicle tracking control devices, or stabilized construction entrances will be installed at locations where construction traffic enters public roadways, as necessary. These measures will minimize the tracking of sediment, mud, and debris onto paved surfaces. Any material deposited on roadways will be promptly removed.

Vehicle wash stations and tracking pads may also be utilized where necessary to reduce the spread of invasive species and sediment from the construction site. Appropriate controls will be implemented to prevent stormwater contamination from wash activities.

Spill Prevention and Materials Management

Potential pollutant sources associated with construction activities include fuels, lubricants, paints, solvents, and other construction-related materials. To prevent water quality impacts, the project will implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan and a Materials Management Plan (MMP). These plans establish procedures for material storage, handling, spill prevention, and spill response.

BMPs include:

- Storage of fuels, chemicals, paints, solvents, and other hazardous materials in protected locations away from stormwater runoff pathways.
- No fueling, lubrication, or hazardous material storage within 100 feet of waterways, wetlands, riparian areas, or floodplains.
- Immediate cleanup and proper disposal of any spills.
- Inspection and maintenance of construction equipment to identify and repair leaks.
- Prohibition of leaking equipment within waterways or environmentally sensitive areas.

Dust Control and Good Housekeeping Measures

Dust generated by clearing, grading, and travel on unpaved roads will be controlled through water application and other appropriate dust suppression practices. Disturbed areas and haul routes will be re-watered as necessary to minimize airborne particulate emissions. Good housekeeping measures will include:

- Routine collection and disposal of trash and construction debris.
- Provision of portable sanitary facilities.
- Proper handling and disposal of sanitary wastes.
- Protection of equipment wash-down areas from stormwater runoff.
- Proper containment and disposal of hazardous materials and wastes

Temporary and Final Stabilization

Disturbed areas will be stabilized as construction progresses whenever practicable. Following pipeline installation and backfilling, disturbed areas will be returned to pre-construction grades and contours, topsoil will be redistributed, and revegetation measures will be implemented. Stabilization measures may include seeding, mulching, erosion control blankets, and other soil stabilization techniques.

Temporary BMPs will remain in place until disturbed areas are adequately stabilized, and a minimum of 70 percent vegetative cover has been established. Once final stabilization is achieved, temporary BMPs will be removed and disturbed areas restored to their intended post-construction condition.

Compensatory Mitigation N/A

Compensatory mitigation is not warranted for the proposed Project because all impacts to jurisdictional aquatic resources would be temporary, and the Project would not result in a permanent loss of waters of the U.S. The Project would temporarily impact approximately 3.78 acres (9,523 linear feet) of potential non-wetland ephemeral interstate waters in Nevada.

Temporary impacts are limited to short-term construction activities associated with trench excavation, pipeline installation, backfilling, equipment operation, and temporary disturbance of

channel substrates and banks at drainage crossings. In addition, minor temporary disturbances associated with powerline construction may occur adjacent to drainage features; however, all poles, anchors, and other permanent support facilities will be located in uplands outside jurisdictional waters. No permanent fill, channelization, bank stabilization, grade-control structures, flow diversions, or other permanent encroachments within waters of the U.S are proposed.

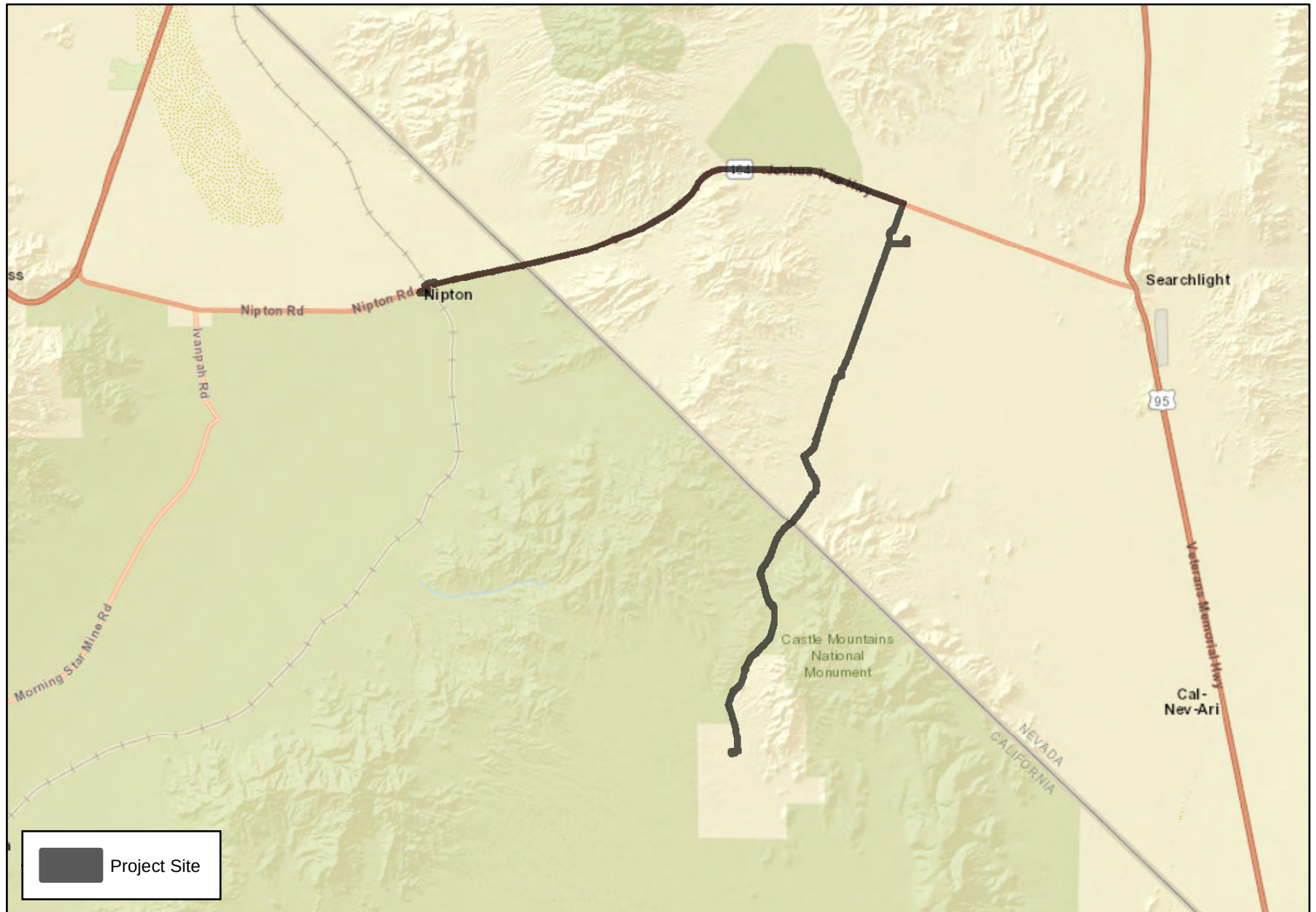
Following completion of construction, all temporarily disturbed aquatic resources will be restored to pre-construction contours, grades, and drainage configurations. Excavated native materials will be returned to trenches, natural drainage patterns will be re-established, and disturbed areas will be stabilized and revegetated, as appropriate, to restore pre-project hydrologic and geomorphic conditions. As described in the Project's documents, a 10-foot-wide unimproved maintenance access road above the buried pipeline is described as a project component; however, this is no longer a component of the Project, it will not be constructed. Consequently, no permanent surface disturbance, maintenance corridor, or long-term conversion of jurisdictional waters is proposed within drainage crossings following restoration.

Because the Project will not result in a permanent loss of aquatic resource acreage, connectivity, flood conveyance, groundwater recharge capacity, or other aquatic functions and values, compensatory mitigation is not required. Temporary impacts will be fully addressed through restoration of affected areas and implementation of avoidance and minimization measures, resulting in the re-establishment of pre-construction conditions and functions. Accordingly, the Project is expected to achieve no net permanent loss of aquatic resources, and compensatory mitigation is not necessary to offset Project-related impacts.

Source: ESRI World Street Map



0 2 4 8
Miles



**IVANPAH UNDERGROUND WATERLINE
AND 69kV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

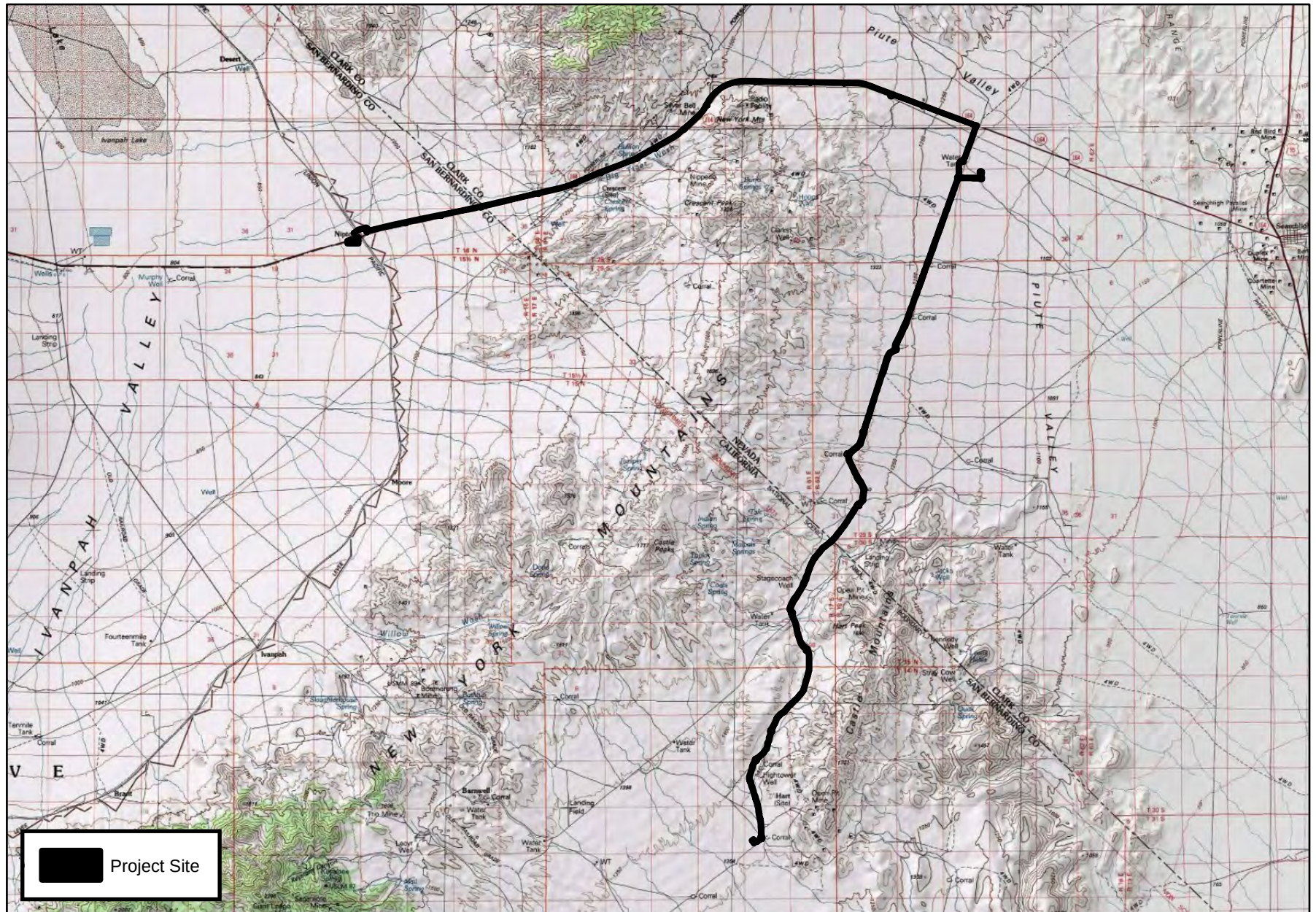
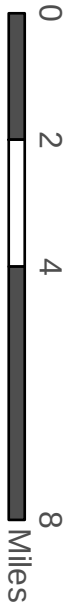
Regional Map

GLENN LUKOS ASSOCIATES

Exhibit 1



Adapted from USGS Crescent Peak, Hart Peak, Highland Spring, Hopps Well, McCullough Mountain, and Nipton, CA & NV quadrangles



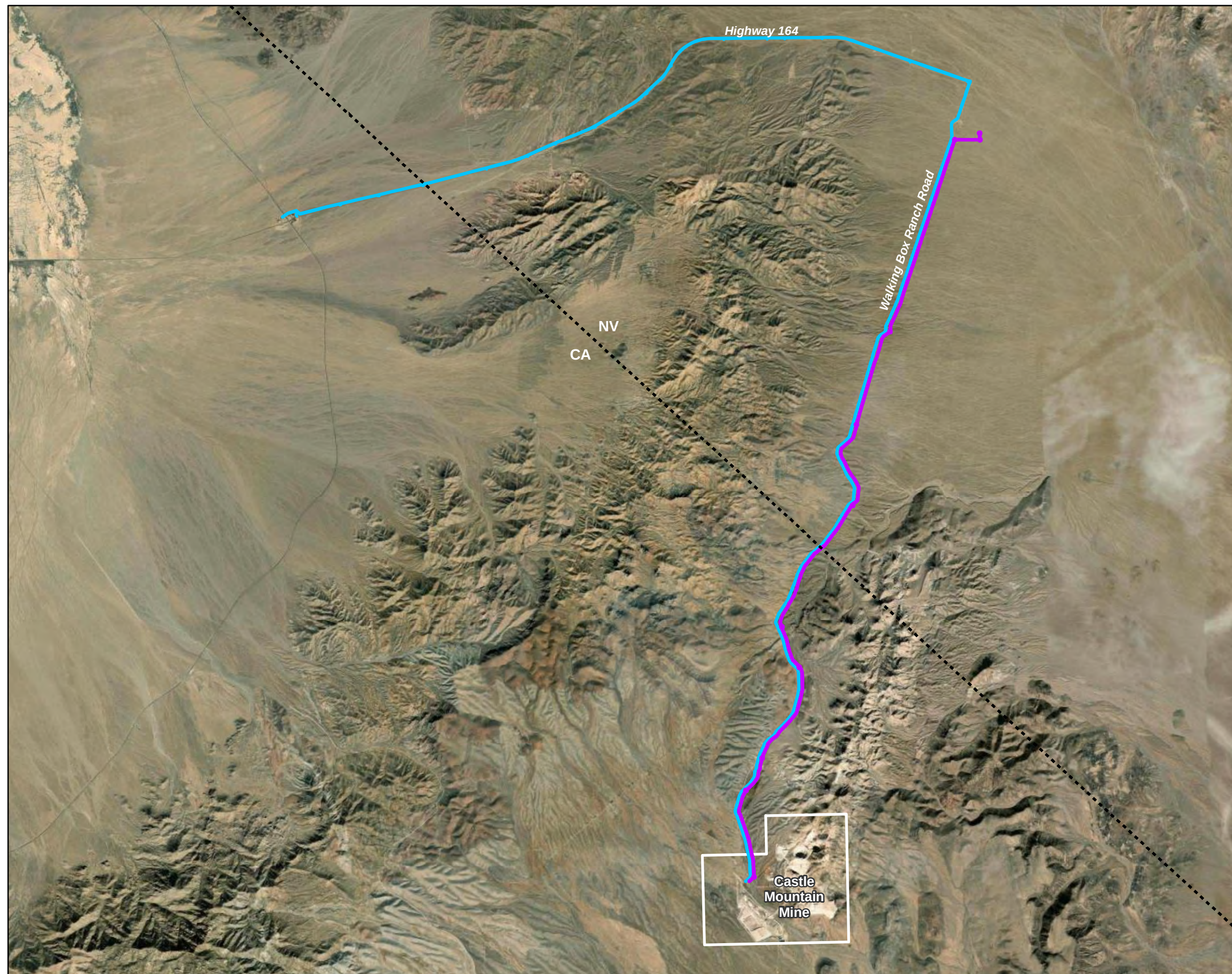
IVANPAH UNDERGROUND WATERLINE AND 69KV OVERHEAD POWERLINE RIGHTS-OF-WAY PROJECT

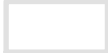
Vicinity Map

GLENN LUKOS ASSOCIATES



Exhibit 2



-  Castle Mountain Mine
-  Proposed Ivanpah Water Pipeline
-  Proposed Overhead Powerline



0 5,000 10,000 20,000
Feet

1 inch = 10,000 feet

Map Prepared by: B. Gale, GLA
Date Prepared: April 28, 2026

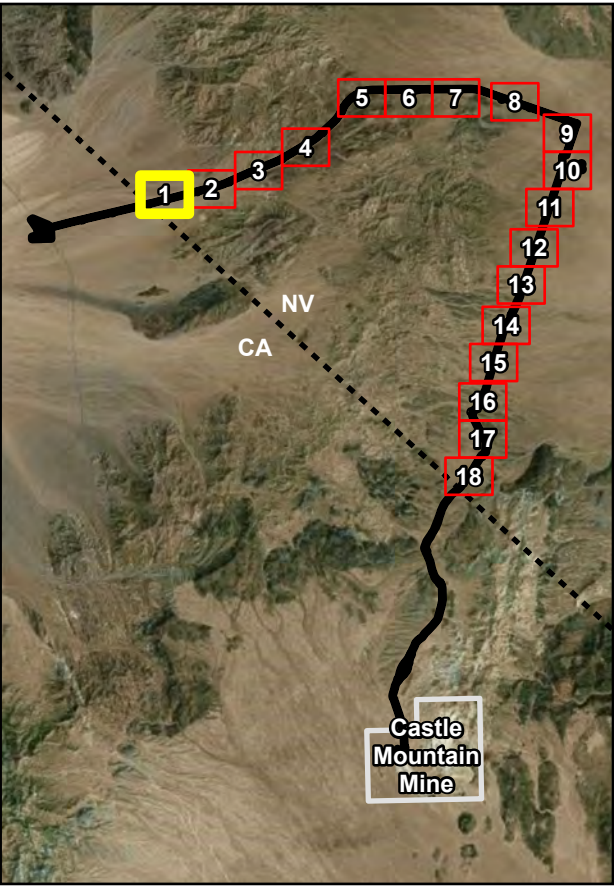
**IVANPAH UNDERGROUND WATERLINE
AND 69kV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Project Map

GLENN LUKOS ASSOCIATES



Exhibit 3



-  Project Site
-  Waterline ROW - Temporary Impact
-  Waters of the U.S./State
-  Flowline



1 inch = 500 feet



Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026

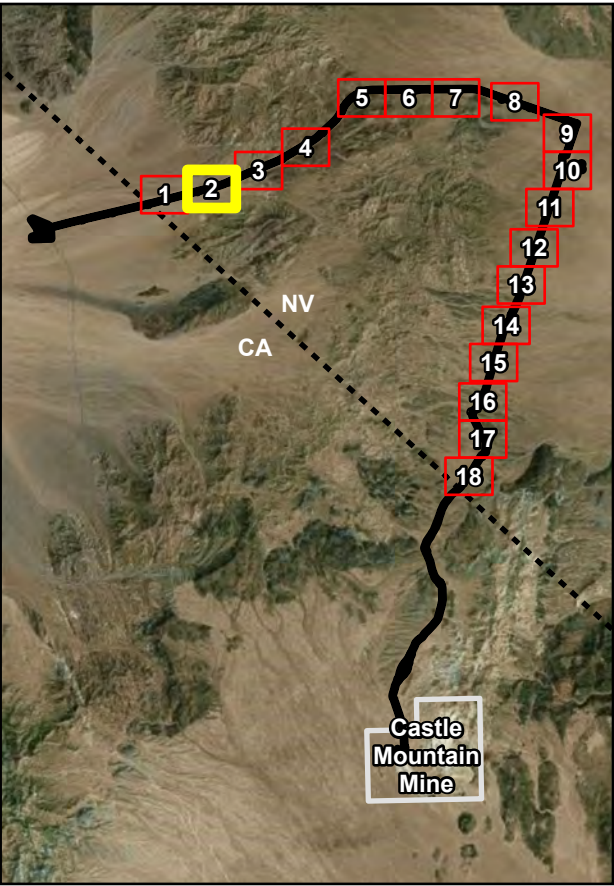
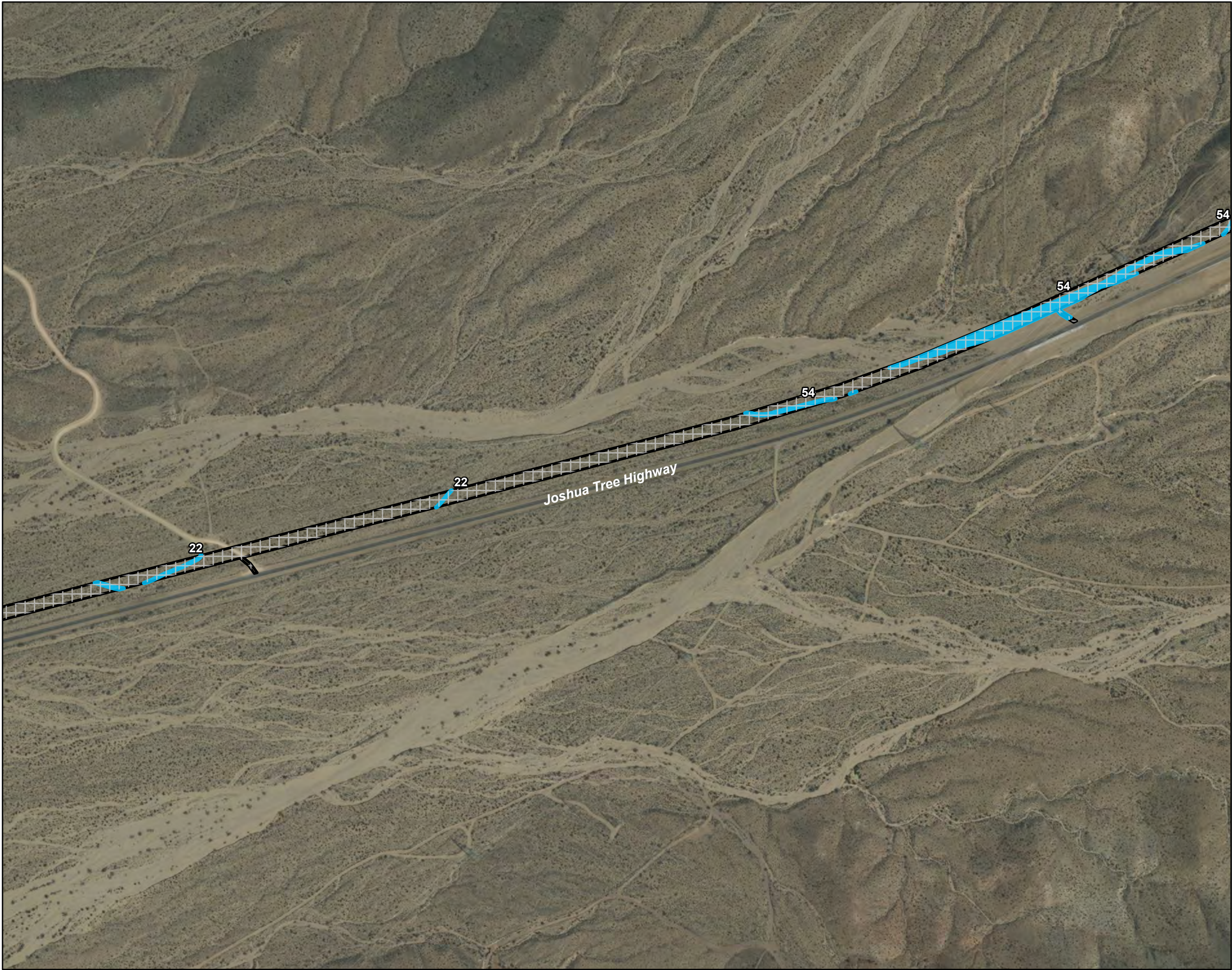
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 1



-  Project Site
-  Waterline ROW - Temporary Impact
-  Waters of the U.S./State



1 inch = 500 feet

Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026



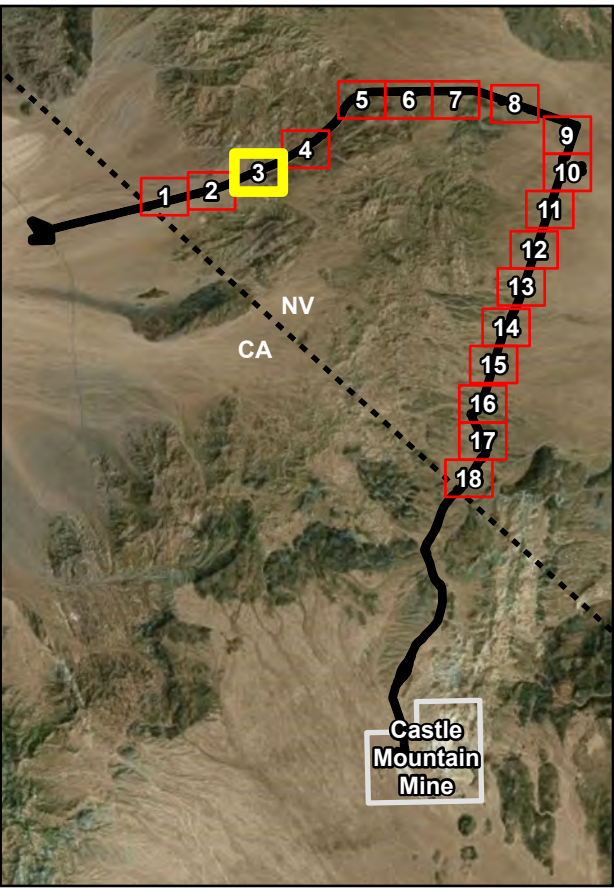
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 2



- Project Site
- Waterline ROW - Temporary Impact
- Waters of the State
- Waters of the U.S./State

0 250 500 1,000
Feet

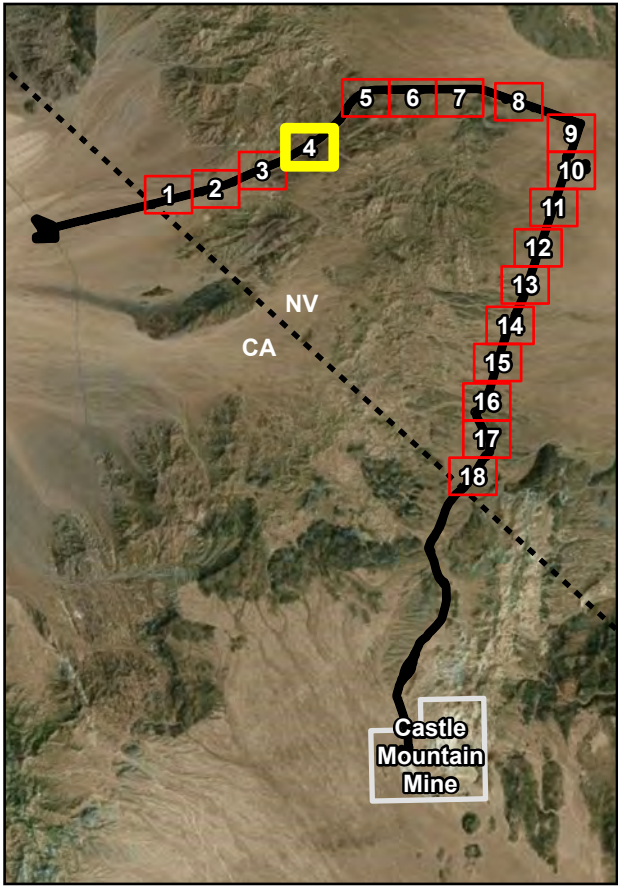
1 inch = 500 feet

Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026



**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map



-  Project Site
-  Waterline ROW - Temporary Impact
-  Waters of the State



1 inch = 500 feet



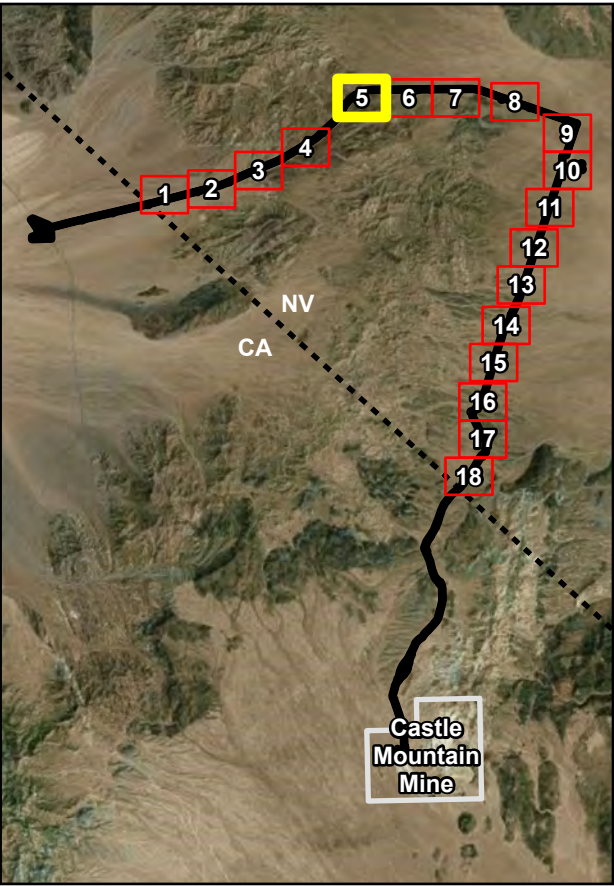
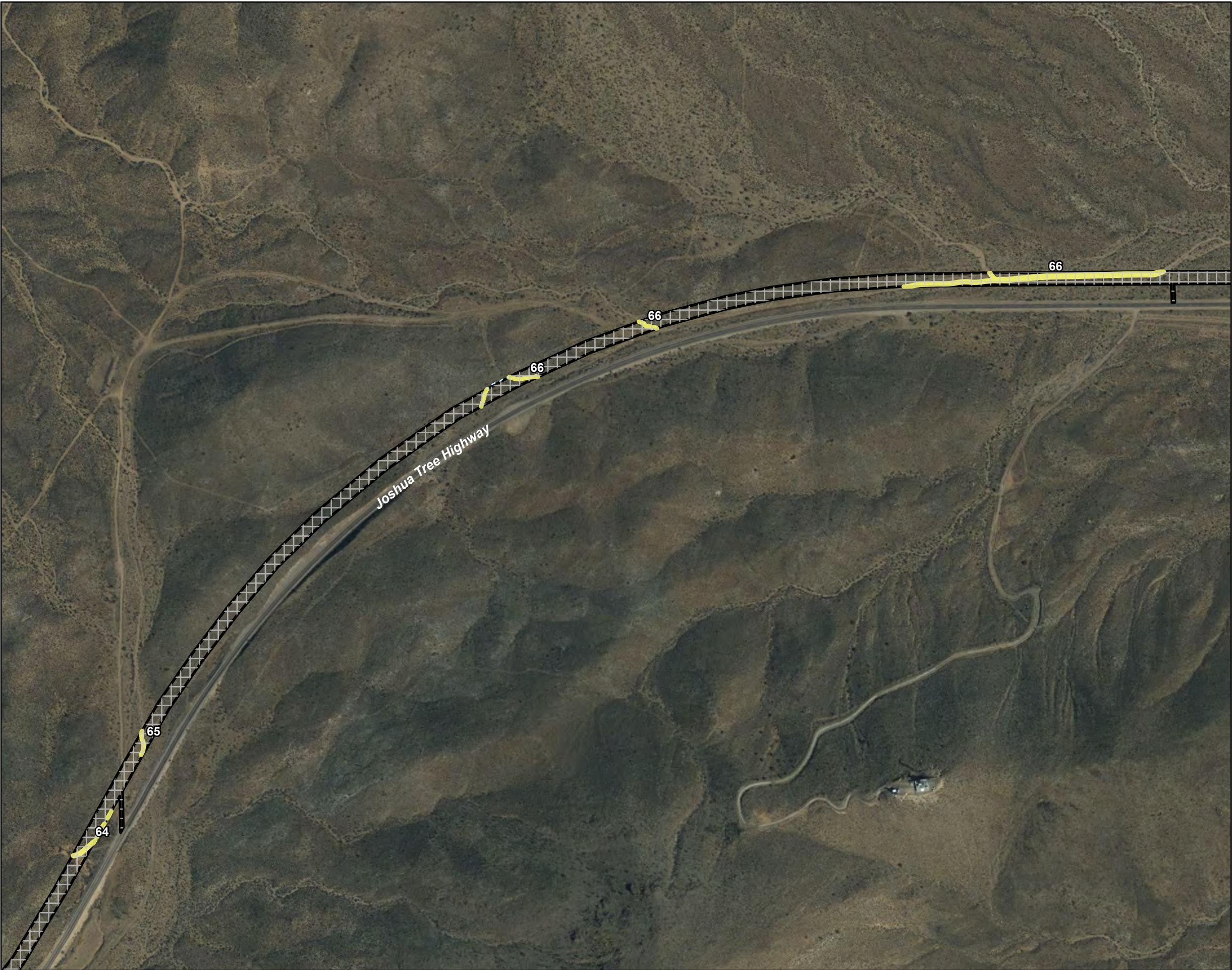
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Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026

**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES





- Project Site
- Waterline ROW - Temporary Impact
- Waters of the State
- Flowline



1 inch = 500 feet



Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026

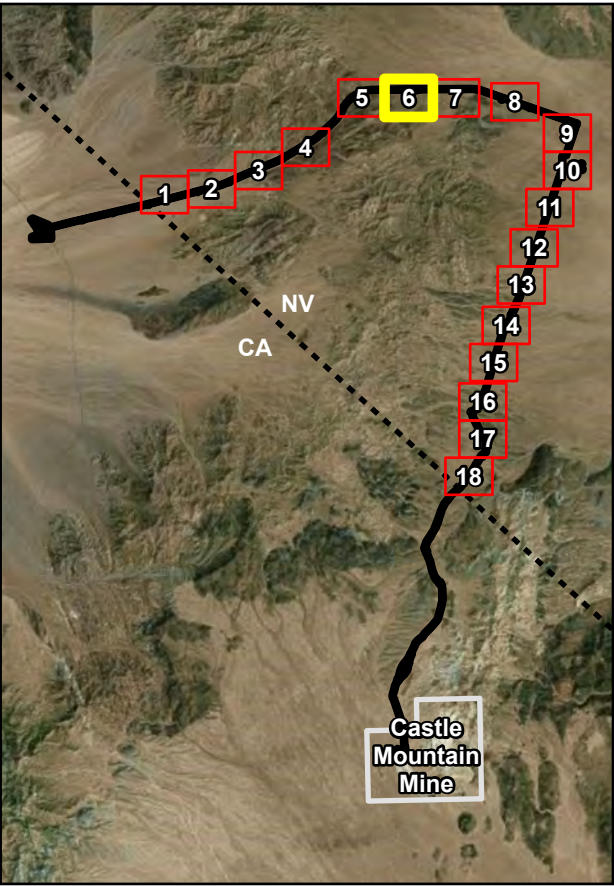
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 5



-  Project Site
-  Waterline ROW - Temporary Impact
-  Waters of the State



1 inch = 500 feet

Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026



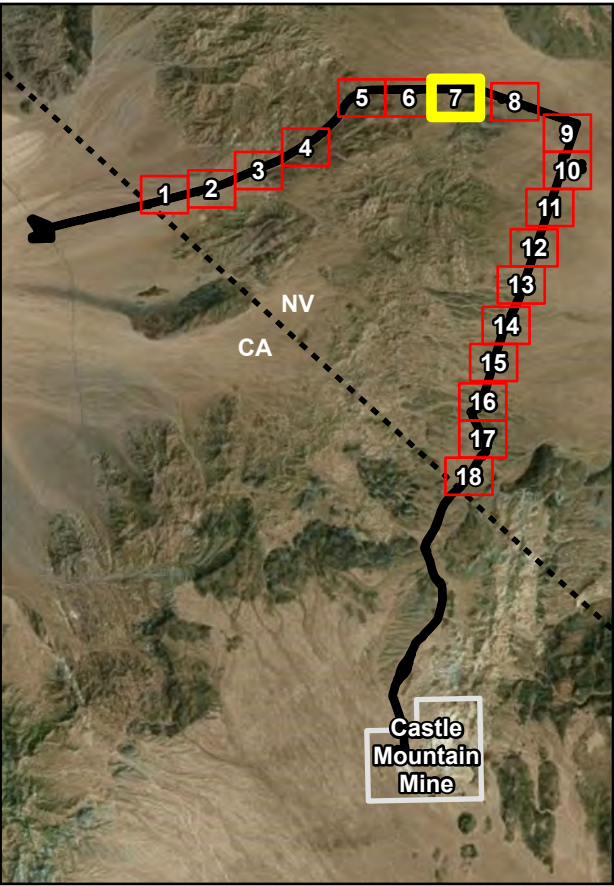
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 6



- Project Site
- Waterline ROW - Temporary Impact
- Waters of the State
- Flowline



1 inch = 500 feet



Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026

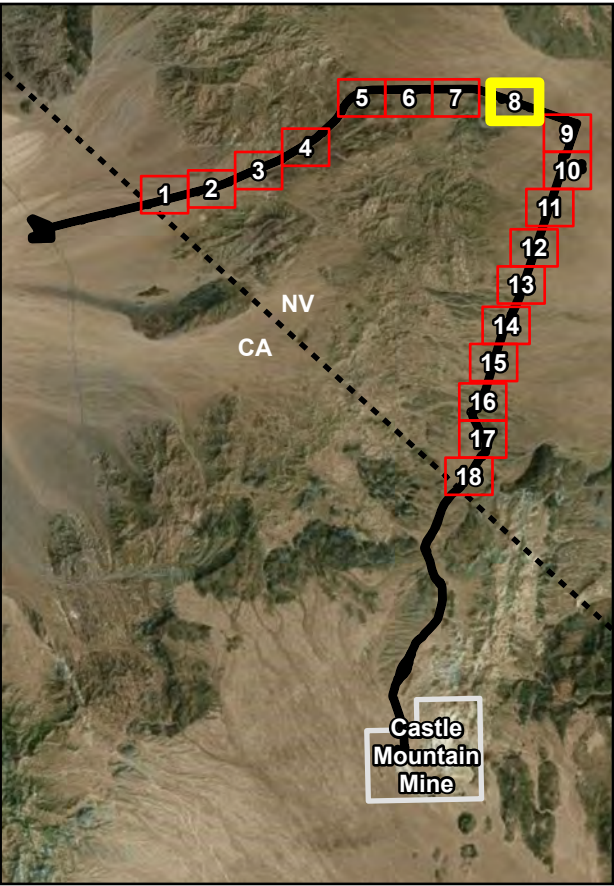
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 7



- Project Site
- Waterline ROW - Temporary Impact
- Staging Area
- Waters of the State



1 inch = 500 feet

Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026



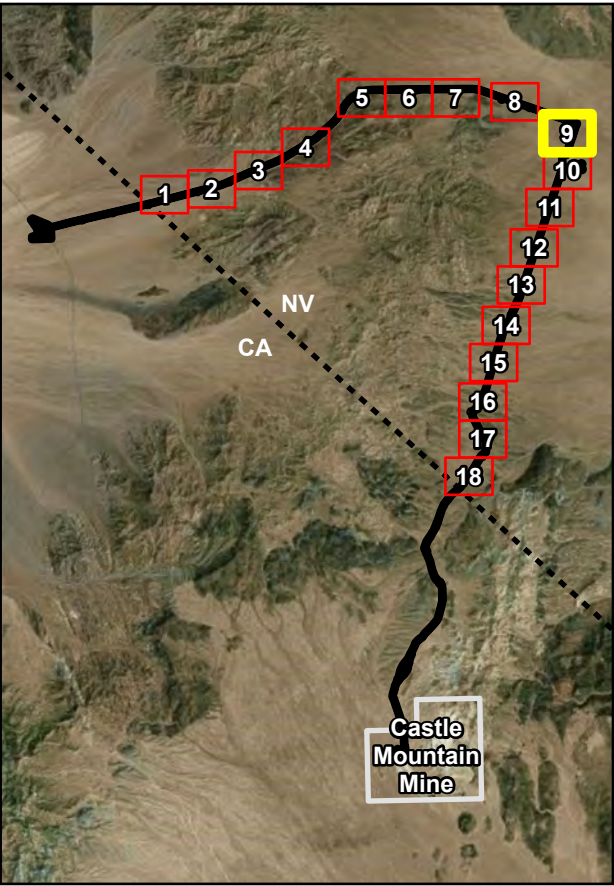
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

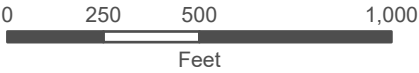
GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 8



-  Project Site
-  Waterline ROW - Temporary Impact
-  Waters of the State



1 inch = 500 feet

Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026



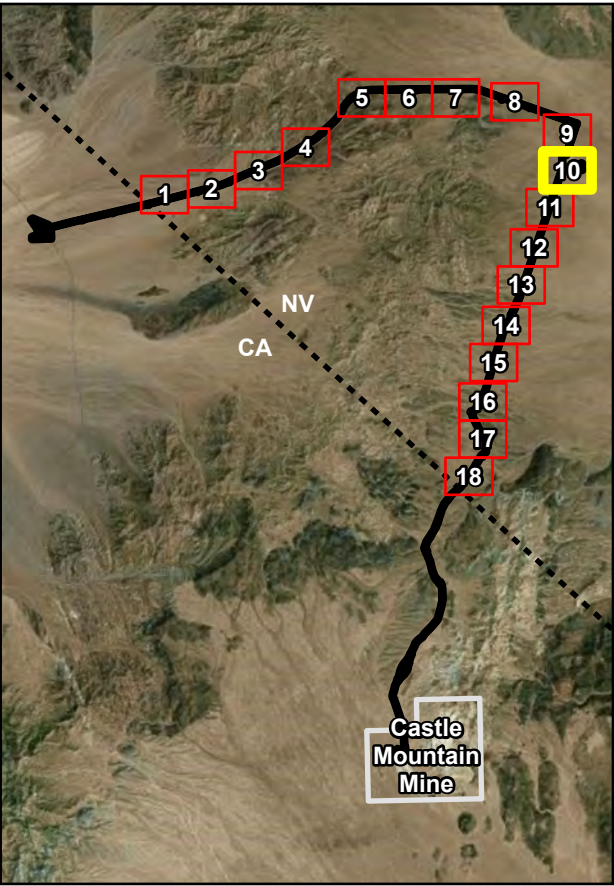
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 9



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Staging Area
- Waters of the State



1 inch = 500 feet



Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026

**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

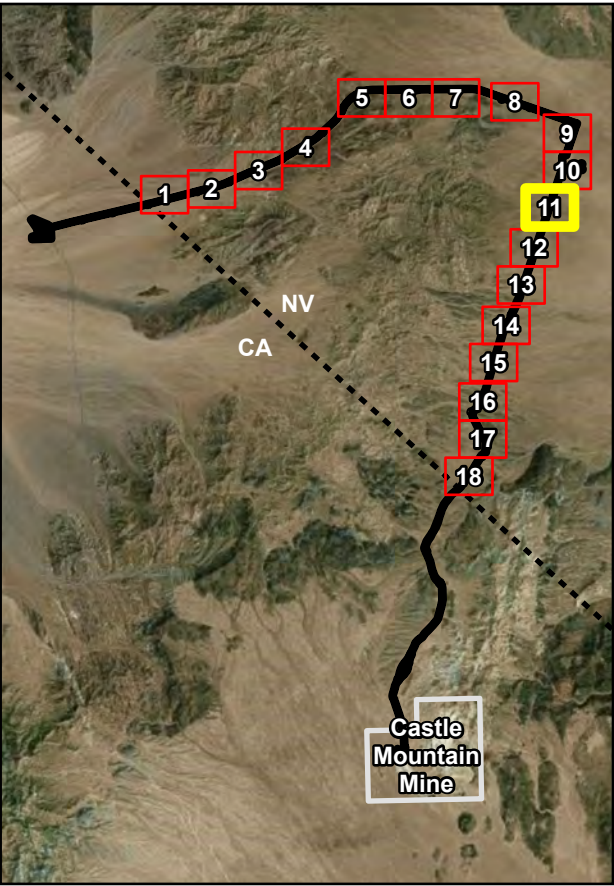
NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

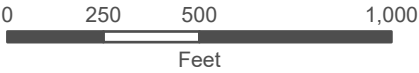


Exhibit 4 - Sheet 10

* No permanent impacts will occur. Power pole foundations will be confined to upland areas, and all temporary work will occur within uplands and/or the temporary impact footprint as defined herein.



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Waters of the State



1 inch = 500 feet

Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026



**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

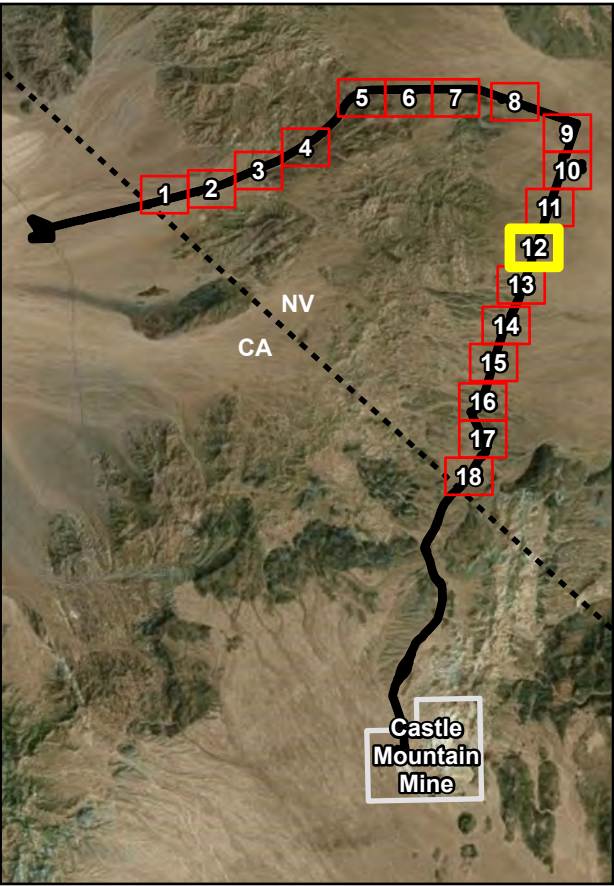
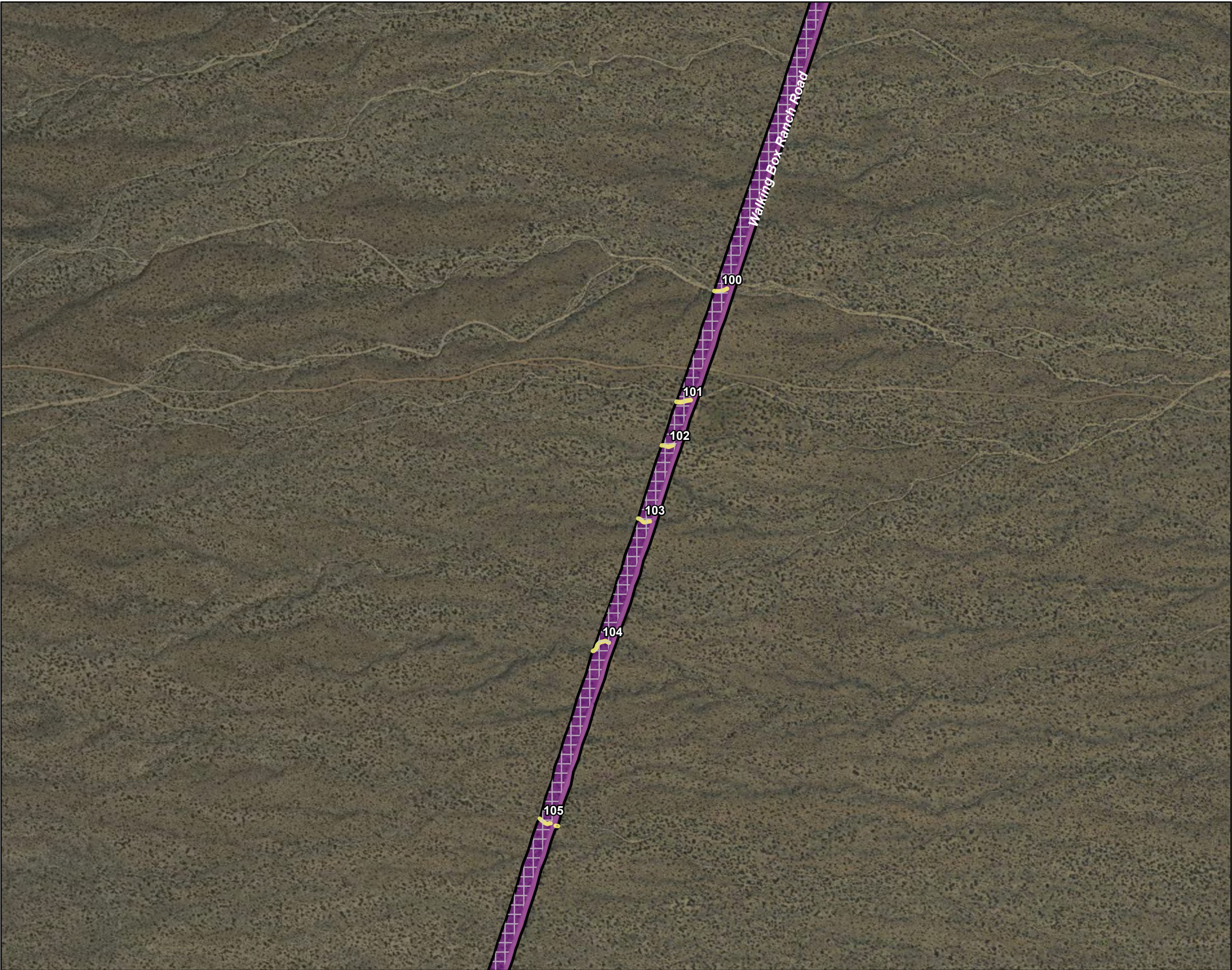
NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

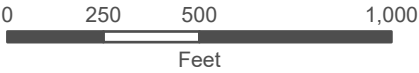


Exhibit 4 - Sheet 11

* No permanent impacts will occur. Power pole foundations will be confined to upland areas, and all temporary work will occur within uplands and/or the temporary impact footprint as defined herein.



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Waters of the State



1 inch = 500 feet

Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026



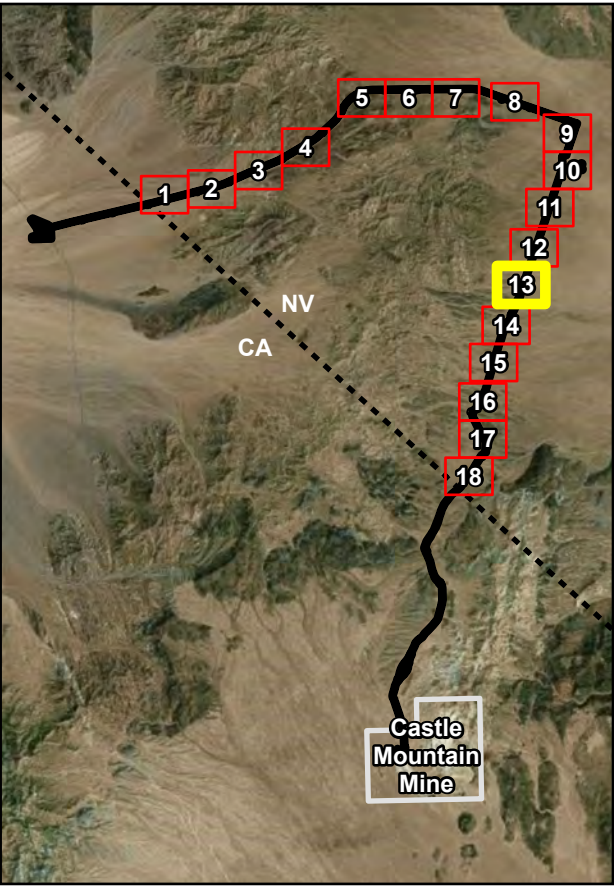
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

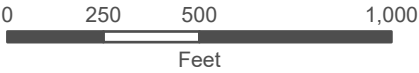
GLENN LUKOS ASSOCIATES

Exhibit 4 - Sheet 12





- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Waters of the State



1 inch = 500 feet



Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026

**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

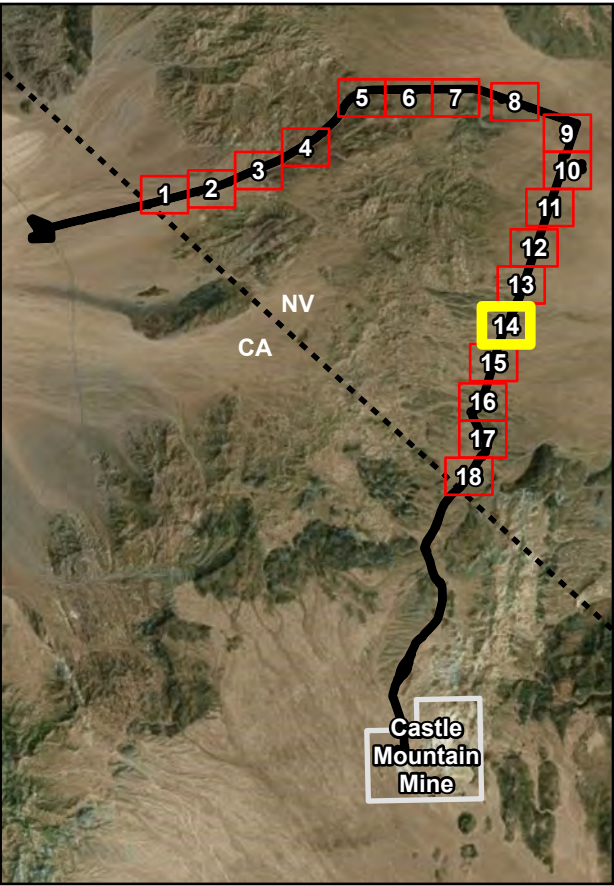
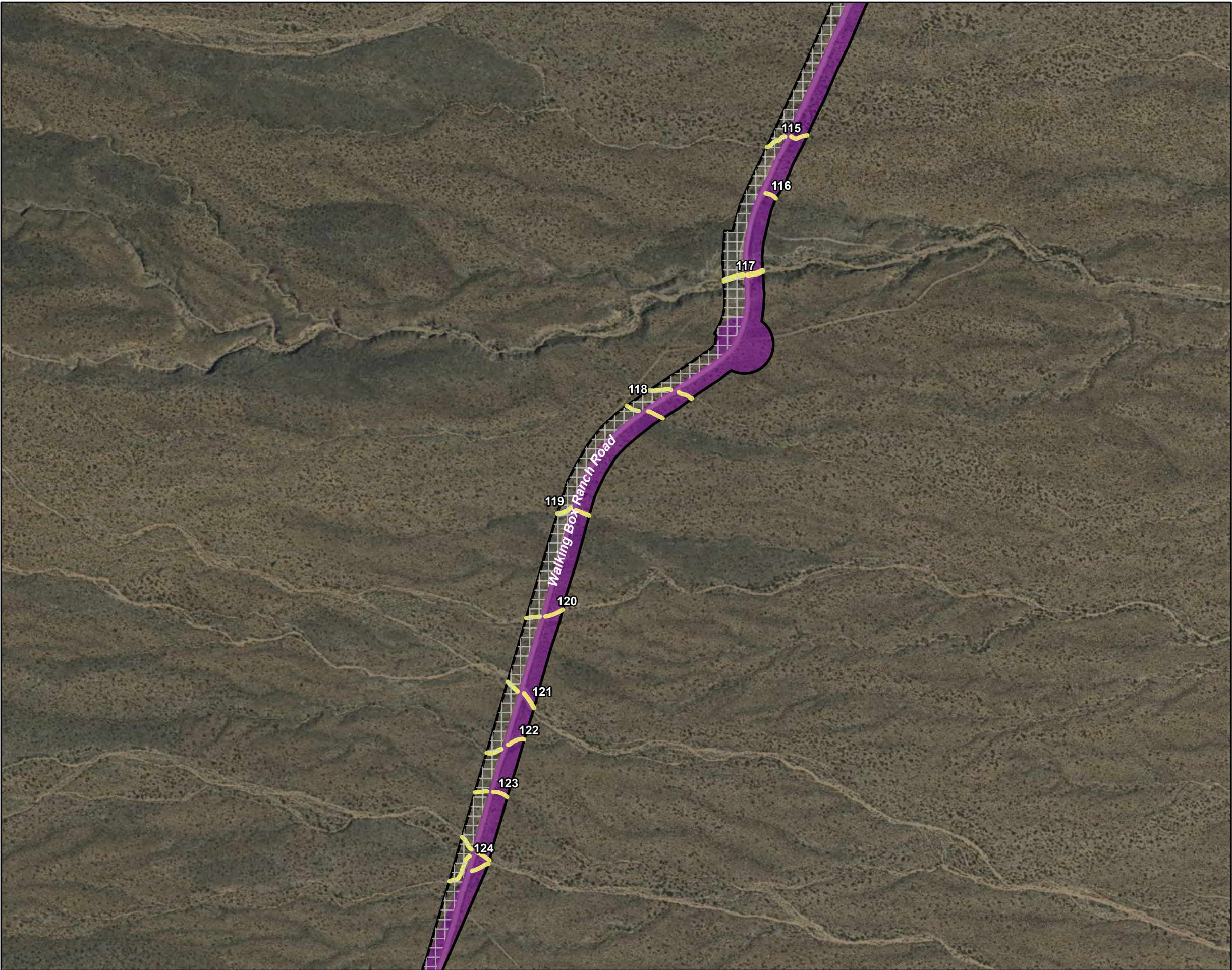
NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

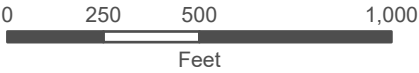


Exhibit 4 - Sheet 13

* No permanent impacts will occur. Power pole foundations will be confined to upland areas, and all temporary work will occur within uplands and/or the temporary impact footprint as defined herein.



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Waters of the State



1 inch = 500 feet



Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026

**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

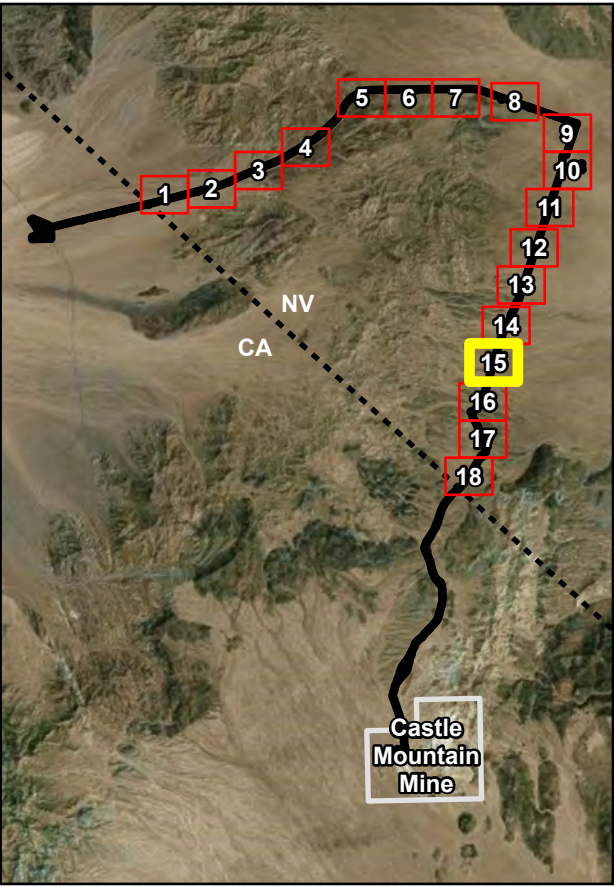
NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 14

* No permanent impacts will occur. Power pole foundations will be confined to upland areas, and all temporary work will occur within uplands and/or the temporary impact footprint as defined herein.



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Waters of the State



1 inch = 500 feet

Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026



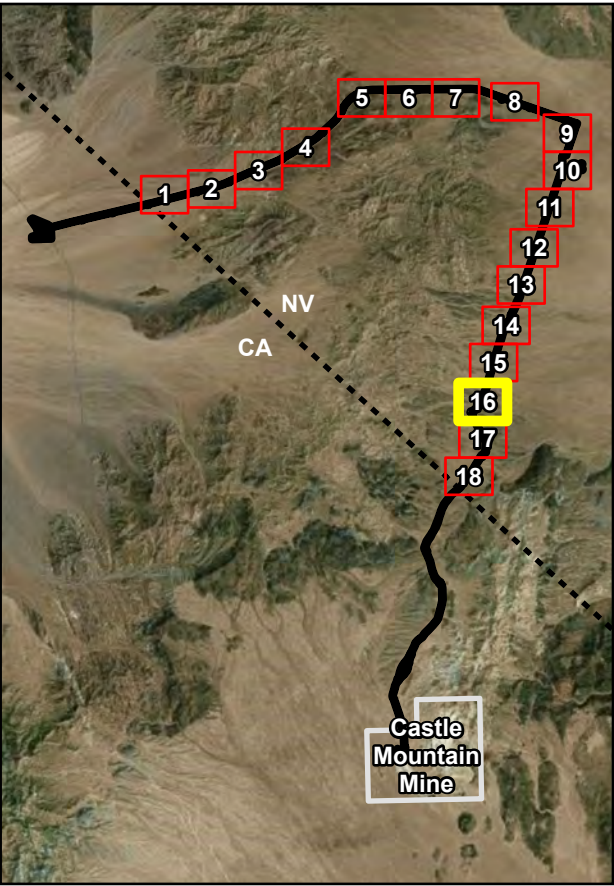
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 15



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Staging Area
- Waters of the State



1 inch = 500 feet

Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026



**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

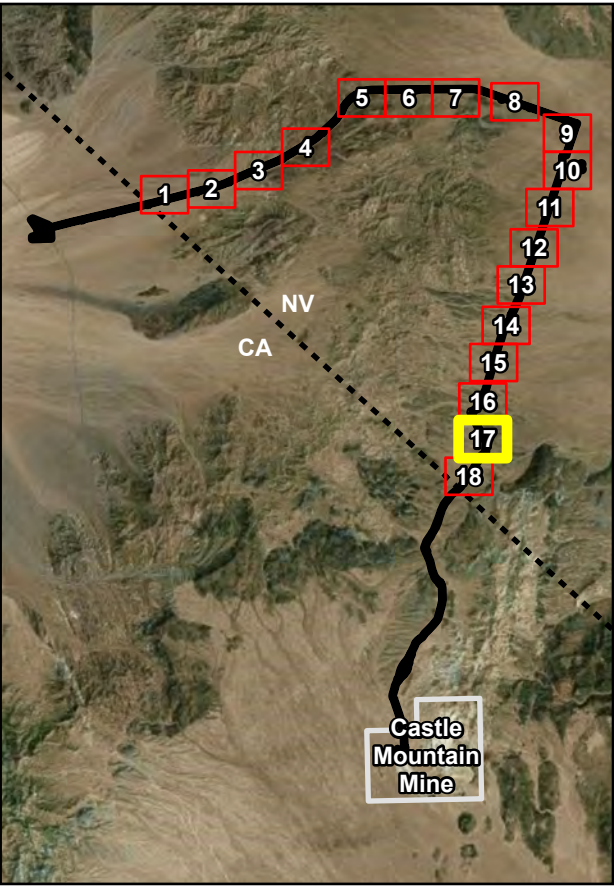
NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

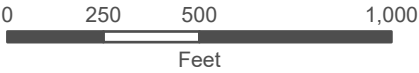


Exhibit 4 - Sheet 16

* No permanent impacts will occur. Power pole foundations will be confined to upland areas, and all temporary work will occur within uplands and/or the temporary impact footprint as defined herein.



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Waters of the State



1 inch = 500 feet



Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026

**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

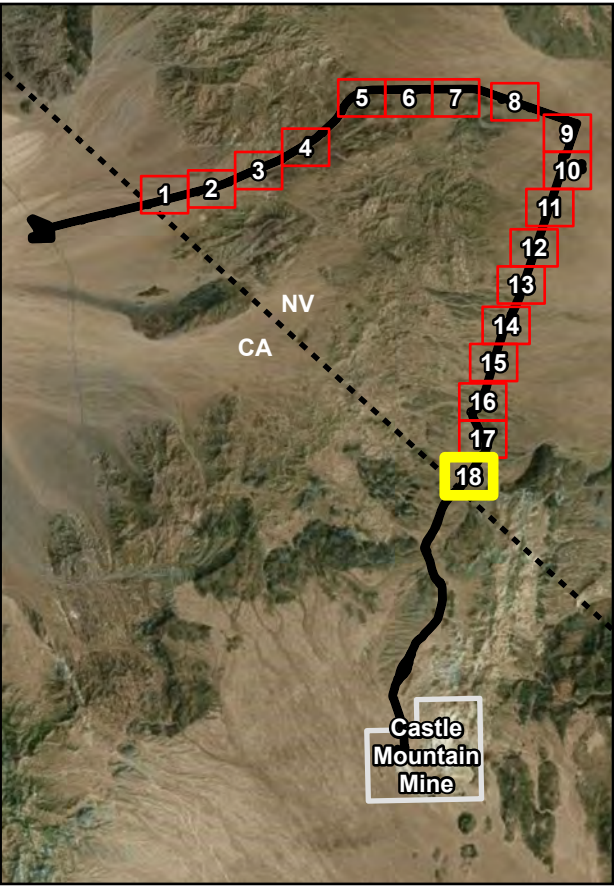
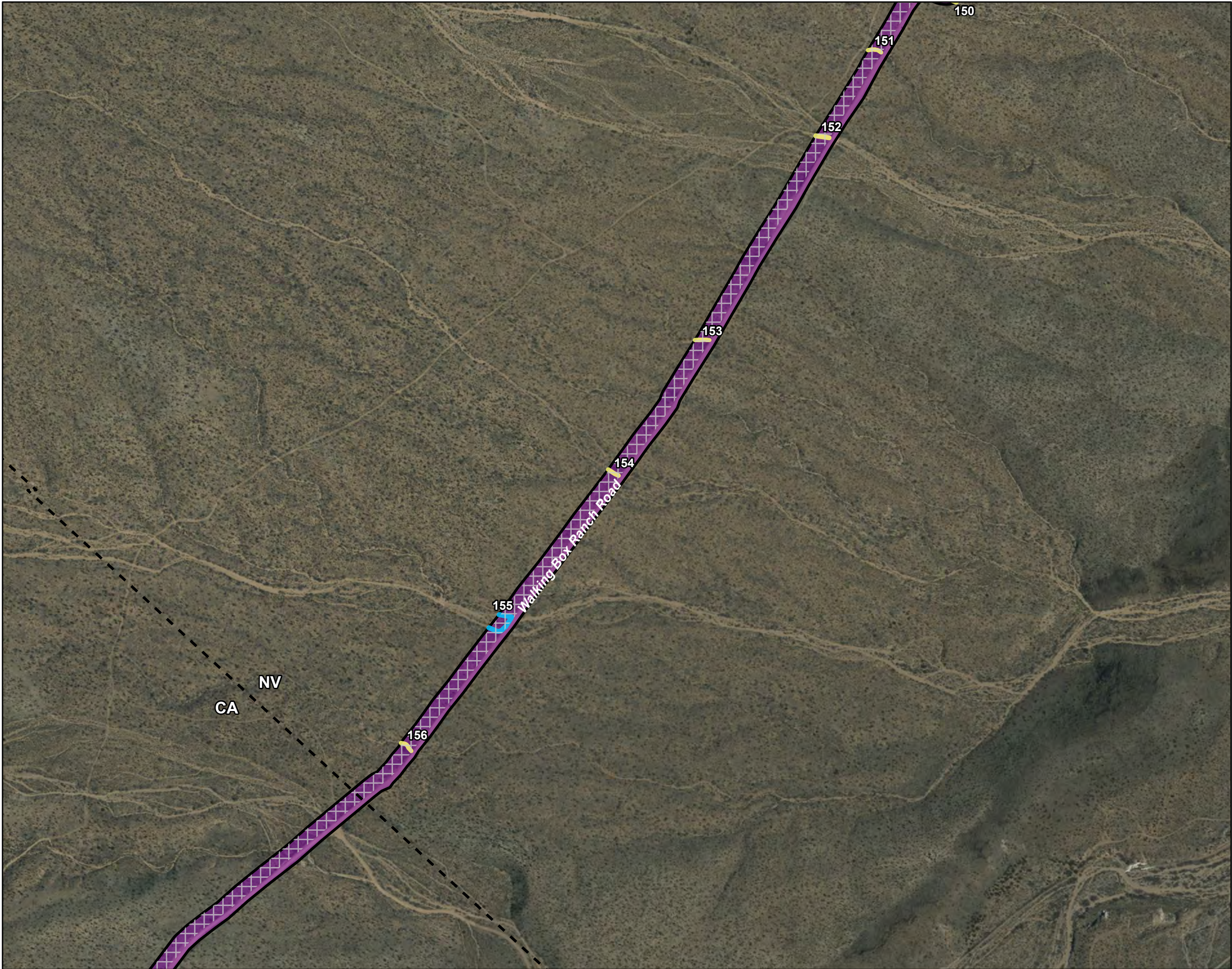
NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 17

* No permanent impacts will occur. Power pole foundations will be confined to upland areas, and all temporary work will occur within uplands and/or the temporary impact footprint as defined herein.



-  Project Site
-  Waterline ROW - Temporary Impact
-  Overhead Powerline ROW *
-  Waters of the State
-  Waters of the U.S./State



1 inch = 500 feet

Coordinate System: State Plane Nevada East
Projection: Transverse Mercator
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 24, 2026



**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

NDEP Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 4 - Sheet 18

* No permanent impacts will occur. Power pole foundations will be confined to upland areas, and all temporary work will occur within uplands and/or the temporary impact footprint as defined herein.



Photograph 1: Representative photo of a typical braided desert wash feature within the Study Area, looking north near the unincorporated town of Nipton.



Photograph 2: Representative photo of a confined desert wash feature within the Study Area, taken along Highway 164, looking north.



Photograph 3: Representative photo of a feature within the Study Area, taken along Highway 164, looking southwest.



Photograph 4: Representative photo of a feature within the Study Area, taken along Highway 164, looking northeast.





Photograph 5: Representative photo of a confined desert wash as seen from the top of Walking Box Ranch Road facing east. Note the large culvert which conveys flows under the roadway.



Photograph 6: Representative photo of a small confined desert wash as seen from the top of Walking Box Ranch Road facing west. Note the small culvert which collects upstream flows and conveys them under the roadway.



Photograph 7: Representative photo of a roadside feature that is contained by the roadway, taken along Walking Box Ranch Road, looking north.



Photograph 8: Representative photo of a paleo-feature, which shows a historic flow pattern, but lacks recent flow evidence and encroachment of upland vegetation. Taken along Walking Box Ranch Road, looking south.

