



July 30, 2026

Department of the Army
Los Angeles District, U.S. Army Corps of Engineers
Regulatory Division
915 Wilshire Blvd., Suite 1109
Los Angeles, CA 90017

SUBJECT: Pre-Construction Notification for the Approximately 31.5-Mile Ivanpah Underground Waterline and 69KV Overhead Powerline Rights-of-Way Project, Located in San Bernardino County, California and Clark County, Nevada

Dear Regulatory Division Coordinator:

On behalf of our client, Castle Mountain Venture (Applicant), GLA is submitting the enclosed Pre-Construction Notification (PCN) requesting authorization under Nationwide Permit (NWP) 58 for temporary impacts to waters of the United States associated with the 31.5-mile Ivanpah Underground Waterline and 69-kV Overhead Powerline Rights-of-Way Project (Project), located in San Bernardino County, California, and Clark County, Nevada. The Project consists of the construction, operation, and maintenance of an underground water transmission pipeline and an overhead electrical transmission line that will provide the water and electrical infrastructure necessary to support the Castle Mountain Mine Phase II Expansion Project.

The Project will result in temporary impacts to 3.86 acres (9,970 linear feet) of potential interstate ephemeral waters of the U.S. No impacts to wetlands or special aquatic sites would occur. Temporary impacts to potential jurisdictional resources are limited to utility construction activities and are proposed for authorization pursuant to NWP 58, Utility Line Activities.

Pre-Application Meeting

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

Other Federal Authorizations

Other federal authorizations currently being sought for the Castle Mountain Mine Phase II Project include BLM approval of an amended Mine Plan of Operations and associated rights-of-way (ROWs) for project facilities located on federal lands. BLM is serving as the lead federal agency for the project and is conducting review and consultation required under applicable federal statutes, including the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act (NHPA), and Section 7 of the Endangered Species Act (ESA). As documented in BLM's July 2026 *National Historic Preservation Act Section 106 Consultation for the Castle Mountain Mine Phase II Project in California and Nevada, Finding of Effect* letter, BLM has initiated Section 106 consultation with the California and Nevada State Historic Preservation Officers (SHPOs), federally recognized Tribes, consulting parties, and the project applicant and is developing a Memorandum of Agreement (MOA) to resolve identified adverse effects to historic properties.

The Mojave desert tortoise (*Gopherus agassizii*) is the only state- and/or federally listed species confirmed to be present and potentially affected within the Project site and utility corridors. Portions of the Project also occur within designated Mojave desert tortoise critical habitat. Accordingly, BLM has initiated Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) as part of its review of the proposed ROW grants and associated NEPA process to ensure compliance with the ESA. The ongoing Section 7 consultation will evaluate potential effects of the Project on the Mojave desert tortoise and designated critical habitat and identify any necessary avoidance, minimization, or mitigation measures.

The Castle Mountain Mine Phase II Project is also considered a FAST-41 Covered project, which is overseen by the federal Permitting Council. The U.S. Army Corps of Engineers and its Section 404 Clean Water Act permitting is included with other federal permits on the projects FAST-41 permitting timetable.

Therefore, federal review of the proposed waterline and powerline facilities is already underway through BLM's processing of the amended Mine Plan of Operations, ROW grants, Section 106 consultation, ESA Section 7 consultation, Tribal consultation, and NEPA review for the broader Castle Mountain Mine Phase II undertaking. The proposed NWP authorization would occur within the context of these ongoing federal reviews and any resulting conservation, avoidance, minimization, or mitigation measures.

Please find attached the following:

- A. Pre-Construction Notification (PCN) form
- B. Additional Information Sheet with 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. Other Agency Applications [Appendix J]:
 - a. Application for California Regional Water Quality Control Board (RWQCB) Section 401 Water Quality Certification
 - b. Application for NDEP Section 401 Water Quality Certification
11. NHPA Section 106 Consultation Letter [Appendix K]

If you have any questions regarding this PCN, please contact me at 949.340.3968 or by email at llokovic@wetlandpermitting.com.

Sincerely,



Lesley Lokovic-Gamber
Principal Senior Regulatory Specialist

p:1359-1a.404letter



ATTACHMENT A

PRE-CONSTRUCTION NOTIFICATION (PCN) FORM



ATTACHMENT B

ADDITIONAL INFORMATION SHEET WITH EXHIBITS

Pre-Construction Notification (PCN) – Additional Information Sheet

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

BLOCK 14: PROPOSED ACTIVITY STREET ADDRESS

No specific street address is associated with the Project site. However, the Project site is located near:

115575 Hart Mine Road
Ivanpah, California 92364

BLOCK 15: LOCATION OF PROPOSED ACTIVITY

Table 2-1 provides coordinates for points along the entire Project alignment by state.

Table 2-1. 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

BLOCK 16: OTHER LOCATION DESCRIPTIONS

The California portion of the Project is located within San Bernardino County and traverses portions of Assessor's Parcel Numbers (APNs): 0569-291-16; 0569-291-21; 0569-291-23; 0569-301-05; 0569-301-06; 0569-301-08; 0569-301-17; 0569-311-09; 0569-311-10; 0569-311-22; 0573-051-01; 0573-061-03; 0573-071-07; 0573-071-08; 0573-071-11; 0573-071-12; 0573-071-13; and 0573-071-19.

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.

BLOCK 19: DESCRIPTION OF PROPOSED NATIONWIDE PERMIT ACTIVITY

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

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 Section 401 Water Quality Certification and/or Waste Discharge Requirements from the Regional Board for activities occurring within waters of the U.S. and 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. The short-term construction ROW would be approximately 45 feet wide within San Bernardino County and would encompass approximately 57 acres. The long-term operational ROW would be approximately 20 feet wide and would encompass approximately 25 acres. 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.

Direct Impacts

Construction of the Project would result in temporary direct impacts to potential interstate waters of the U.S. where the buried pipeline crosses desert washes. 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. are proposed

Indirect Impacts

Indirect impacts to Corps jurisdiction 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.

BLOCK 20: DESCRIPTION OF PROPOSED MITIGATION

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 Corps jurisdiction is provided below.

Proposed Avoidance and Minimization Measures

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 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.

BLOCK 24: EXPLAIN WHY ENVIRONMENTAL EFFECTS ARE NO MORE THAN MINIMAL AND WHY COMPENSATORY MITIGATION SHOULD NOT BE REQUIRED

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 3.86 acres (9,970 linear feet) of potential non-wetland ephemeral interstate waters.

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 CEQA document, 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.

BLOCK 27: HISTORIC PROPERTIES

Cultural resources investigations conducted for the Castle Mountain Mine Phase II Project identified several historic properties and archaeological resources within the Area of Potential Effects (APE) for the proposed waterline and transmission line corridors. Historic properties relevant to the linear utility components include the NRHP-listed Walking Box Ranch (26CK4626/NRHP #08001392), the NRHP-eligible Searchlight-to-Nipton Road (26CK3081/26CK7466), the NRHP-eligible Eldorado-Lugo 500-kV Transmission Line (S2128/26CK10806), the Historic Von Schmidt Line (CA-SBR-6835), and other prehistoric and historic archaeological resources located within the broader project APE. The Bureau of Land Management (BLM), serving as the lead federal agency for the Castle Mountain Mine Phase II Project, completed identification, evaluation, and effects assessments for historic properties and documented its findings in its July 2026 *National Historic Preservation Act Section 106 Consultation for the Castle Mountain Mine Phase II Project in California and Nevada, Finding of Effect* letter to the California and Nevada State Historic Preservation Officers (SHPOs).

Section 106 consultation has already been initiated because BLM's approval of the amended Plan of Operations and associated rights-of-way, including the proposed waterline and powerline

facilities, constitutes a federal undertaking subject to Section 106 of the National Historic Preservation Act. As the lead federal agency, BLM is coordinating NHPA compliance in conjunction with its review of the overall undertaking and associated NEPA analysis and has consulted with the California and Nevada SHPOs, Indian Tribes, consulting parties, and the project applicant regarding potential effects to historic properties.

In its Finding of Effect letter, BLM determined that the Walking Box Ranch (26CK4626), Searchlight-to-Nipton Road (26CK3081/26CK7466), and Eldorado-Lugo 500-kV Transmission Line (S2128/26CK10806) would be avoided through project design and would not be adversely affected by the undertaking. BLM further concluded that the proposed transmission line would not adversely affect the setting or integrity of the NRHP-listed Walking Box Ranch. Most other identified historic properties within the utility corridor APE would likewise be avoided through project design.

BLM identified adverse effects to one NRHP-eligible prehistoric archaeological site (P-36-005872/CA-SBR-5872) and one unevaluated historic archaeological site (JM-S-08) within the overall Castle Mountain Mine Phase II undertaking and subsequently initiated formal consultation pursuant to 36 CFR § 800.6 to resolve those adverse effects through development of a Memorandum of Agreement (MOA). BLM also continues government-to-government consultation with interested Tribes regarding the undertaking.

Accordingly, historic properties that may be affected by the proposed waterline and powerline facilities are currently being addressed through BLM's ongoing Section 106 consultation for the larger federal undertaking. Any authorization issued under the requested Nationwide Permit would occur within the context of that ongoing federal review and any avoidance, minimization, or mitigation measures developed through the Section 106 process and memorialized in the resulting agreement documents.

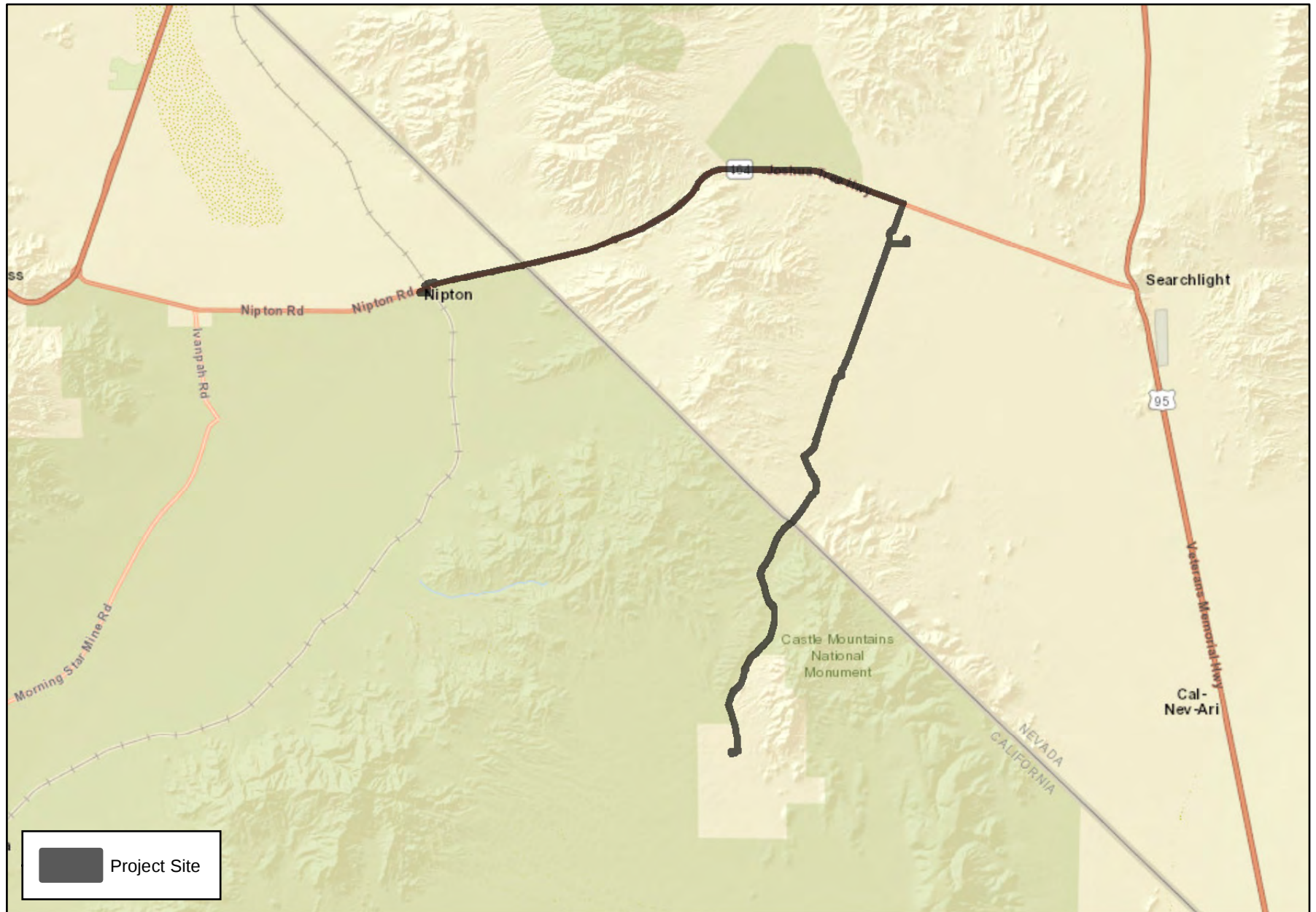
BLOCK 30:

N/A

Source: ESRI World Street Map



0 2 4 8
Miles



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

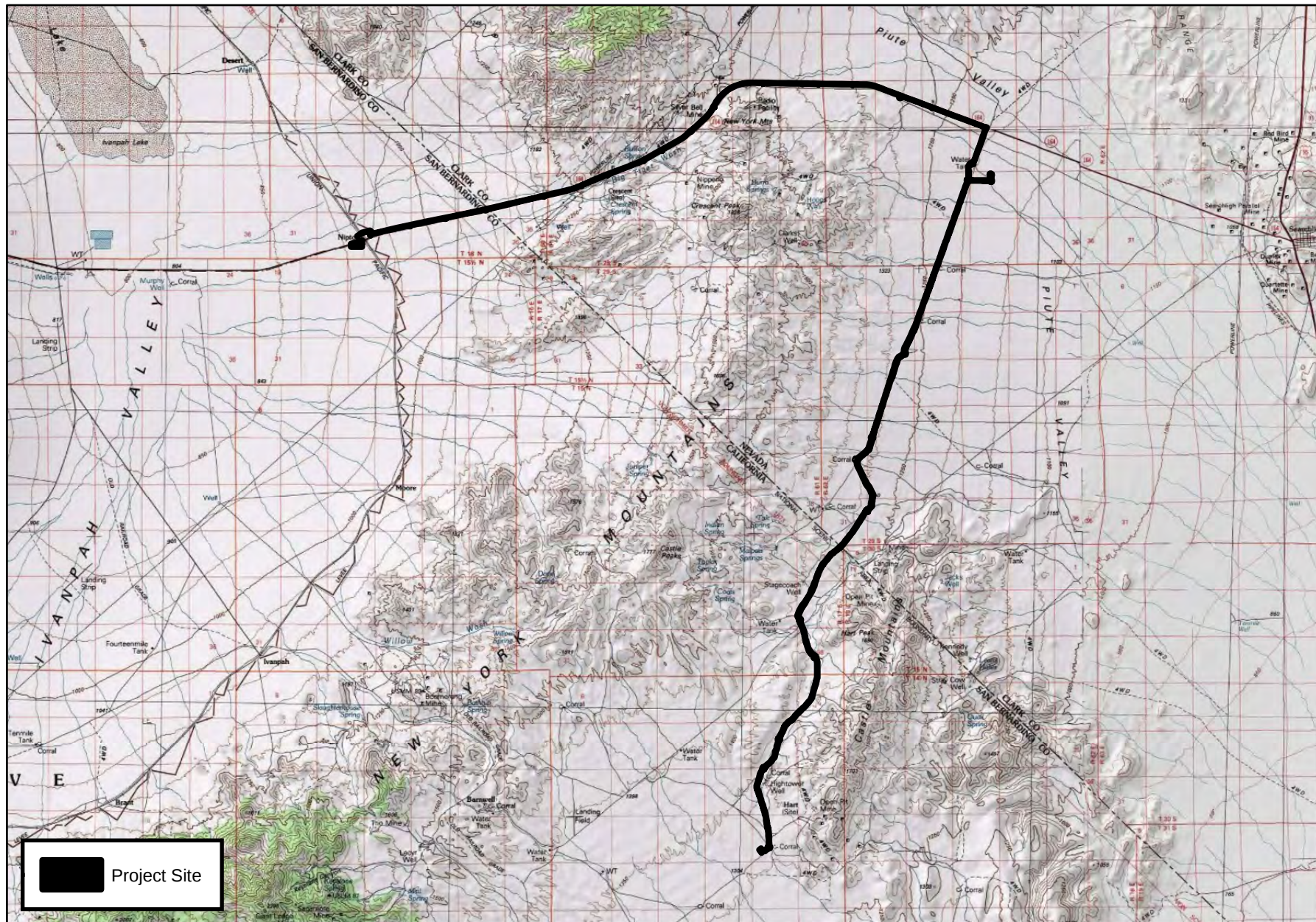
Regional Map

GLENN LUKOS ASSOCIATES

Exhibit 1



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



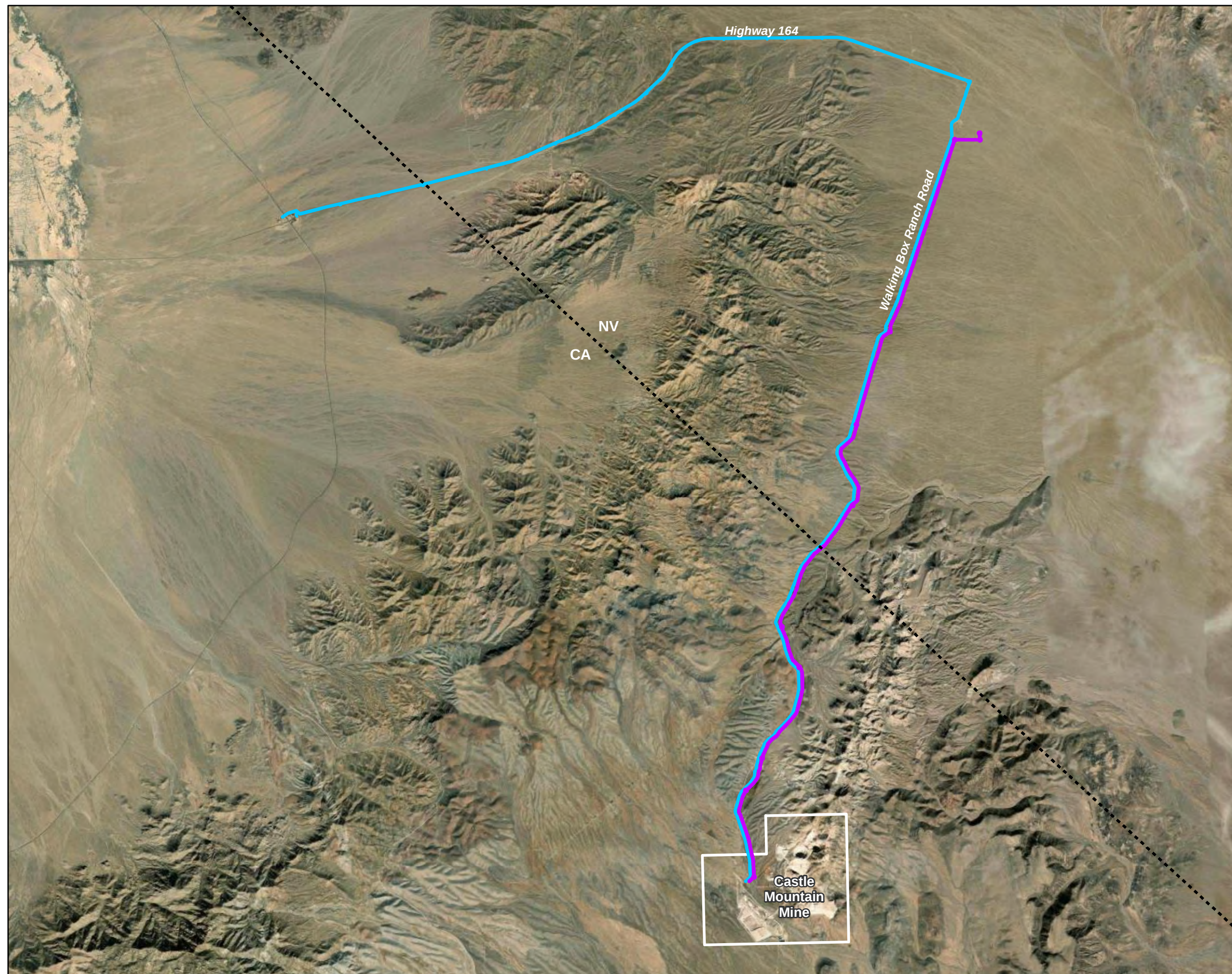
IVANPAH UNDERGROUND WATERLINE AND 69KV OVERHEAD POWERLINE RIGHTS-OF-WAY PROJECT

Vicinity Map

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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

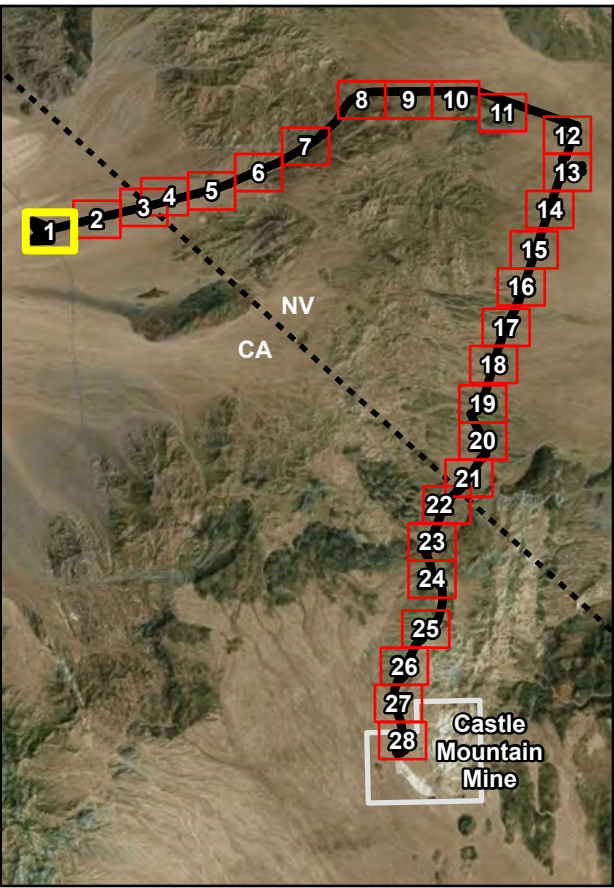
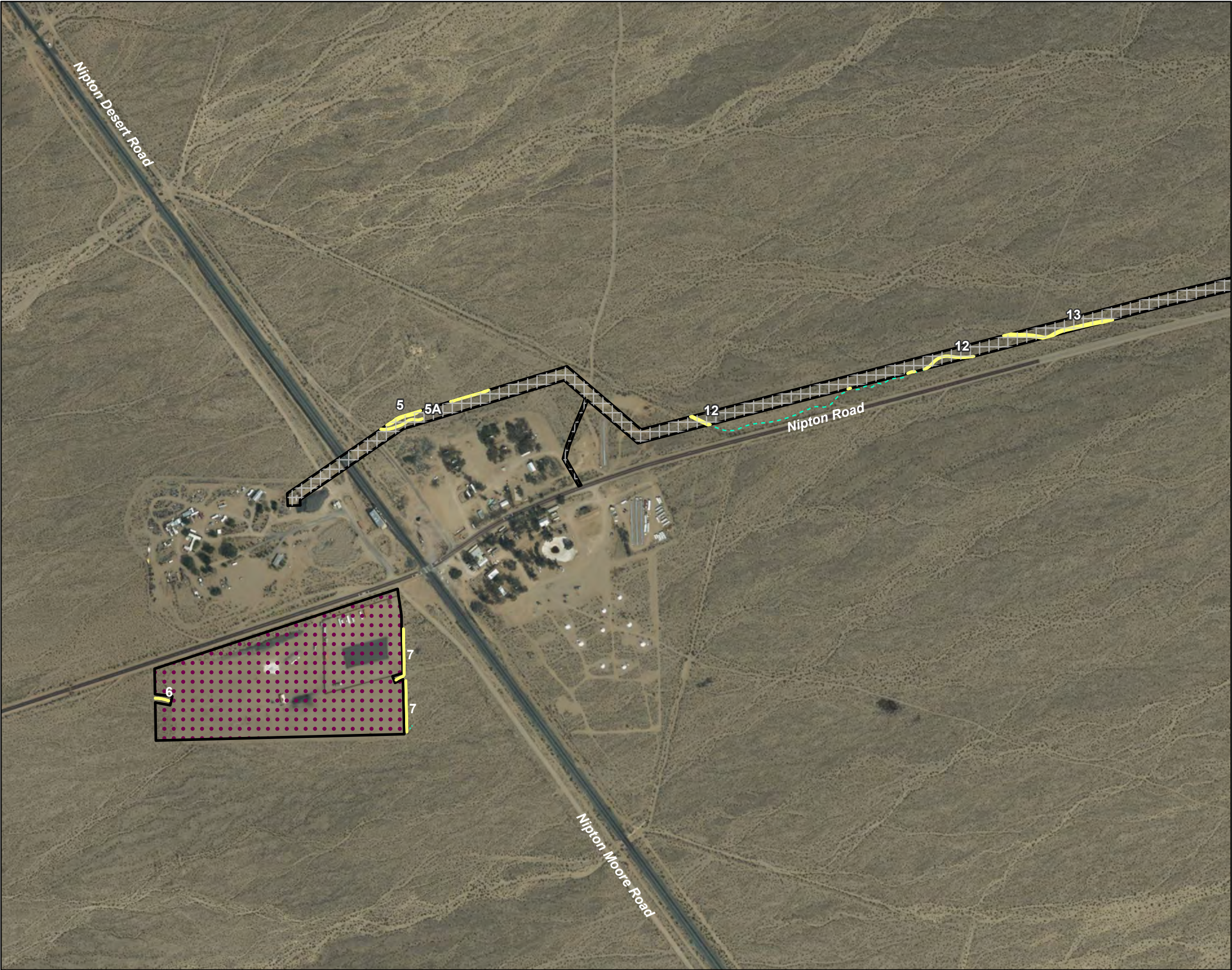
**IVANPAH UNDERGROUND WATERLINE
AND 69kV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Project Map

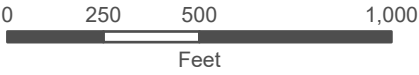
GLENN LUKOS ASSOCIATES



Exhibit 3



- Project Site
- Waterline ROW - Temporary Impact
- Staging Area
- Non-Jurisdictional Ephemeral Feature
- Flowline



1 inch = 500 feet

Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026



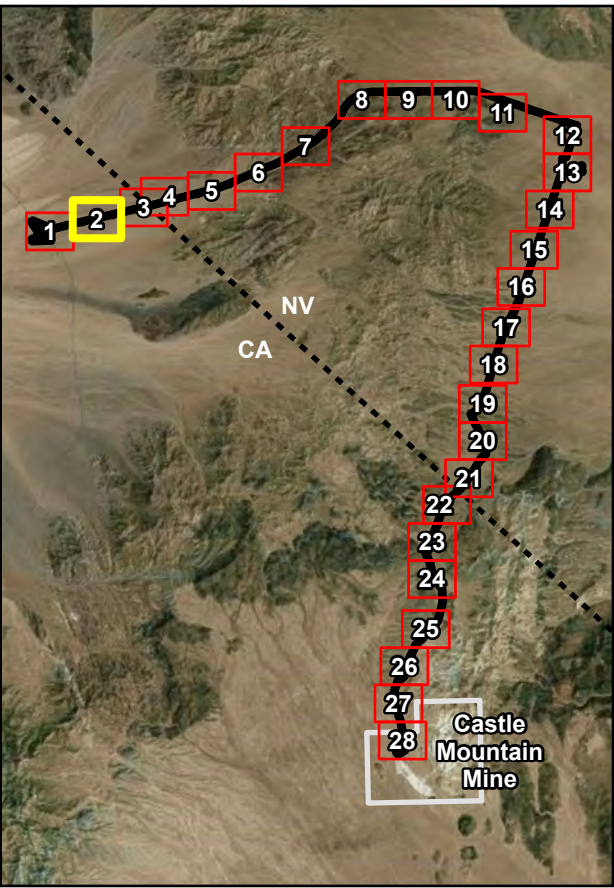
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

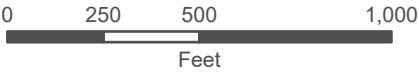
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Exhibit 3 - Sheet 1



- Project Site
- Waterline ROW - Temporary Impact
- Non-Jurisdictional Ephemeral Feature
- Flowline



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

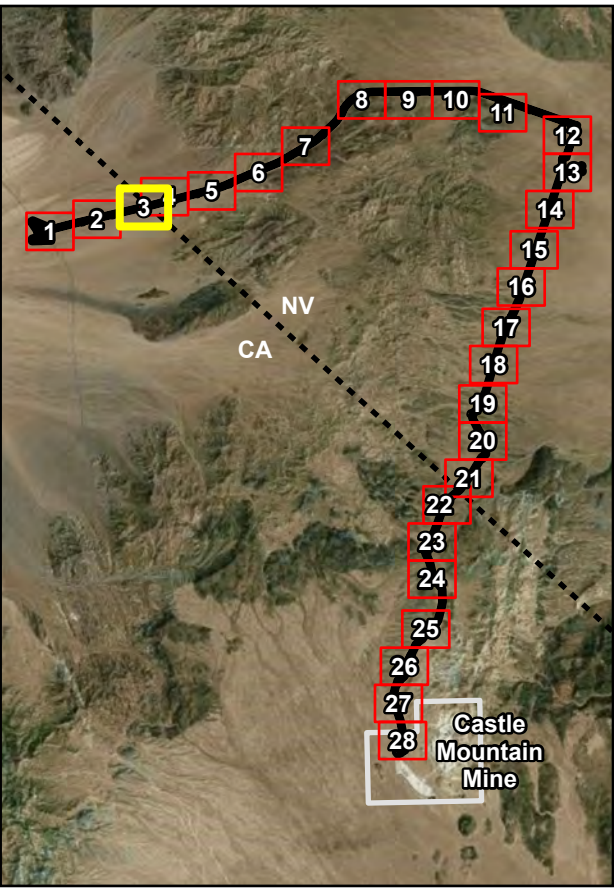
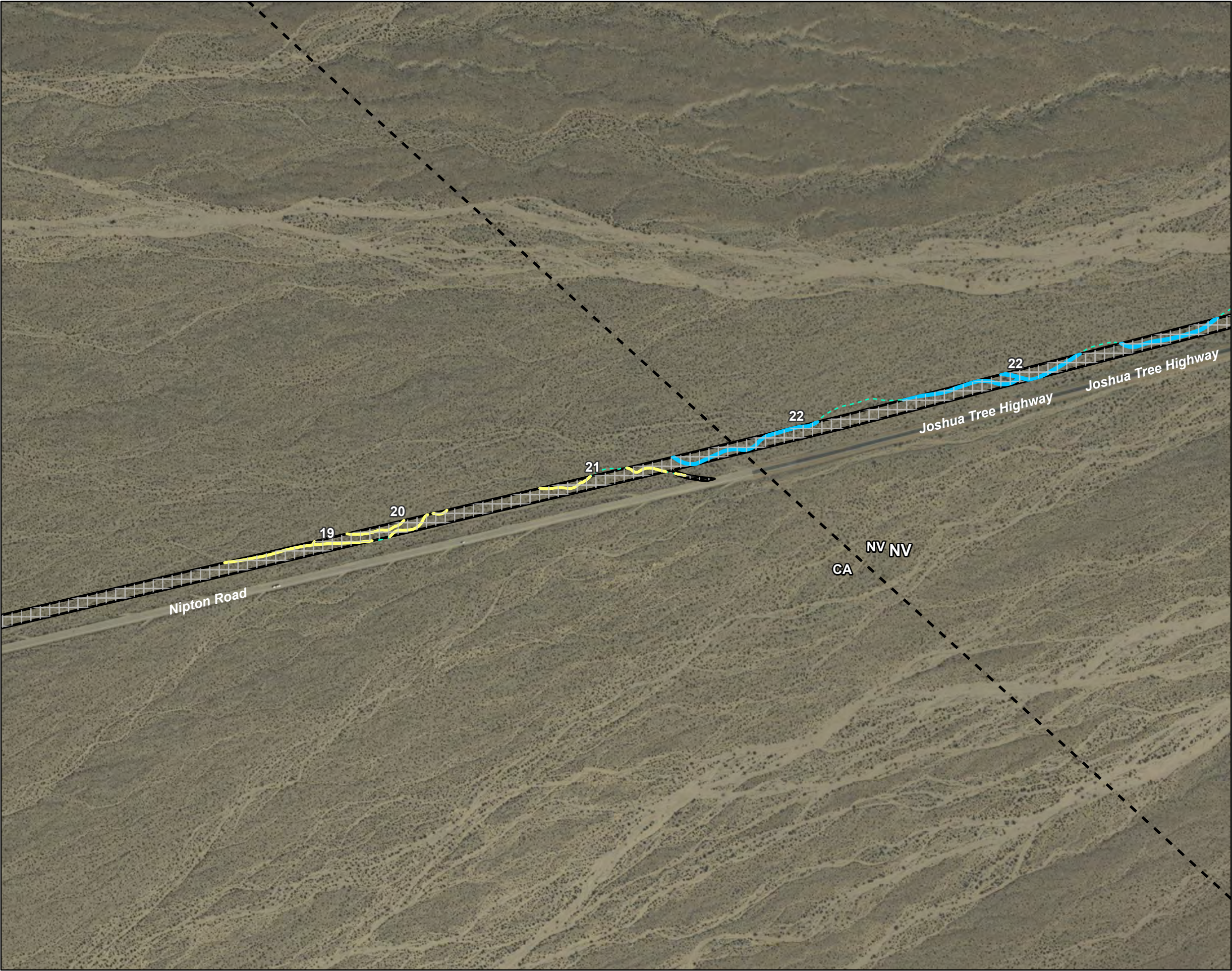
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

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Exhibit 3 - Sheet 2



- Project Site
- Waterline ROW - Temporary Impact
- Non-Jurisdictional Ephemeral Feature
- Potential Interstate Waters - Ephemeral Feature
- Flowline



1 inch = 500 feet



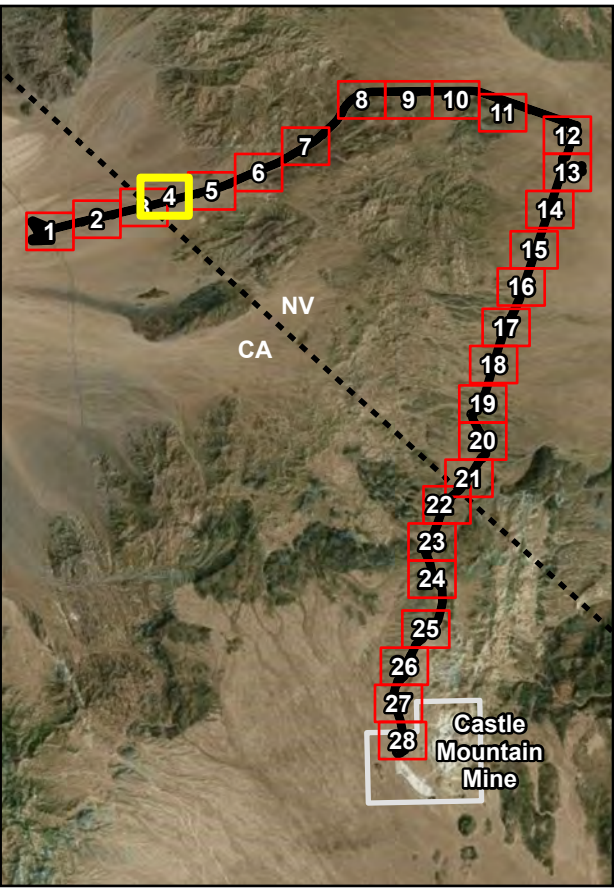
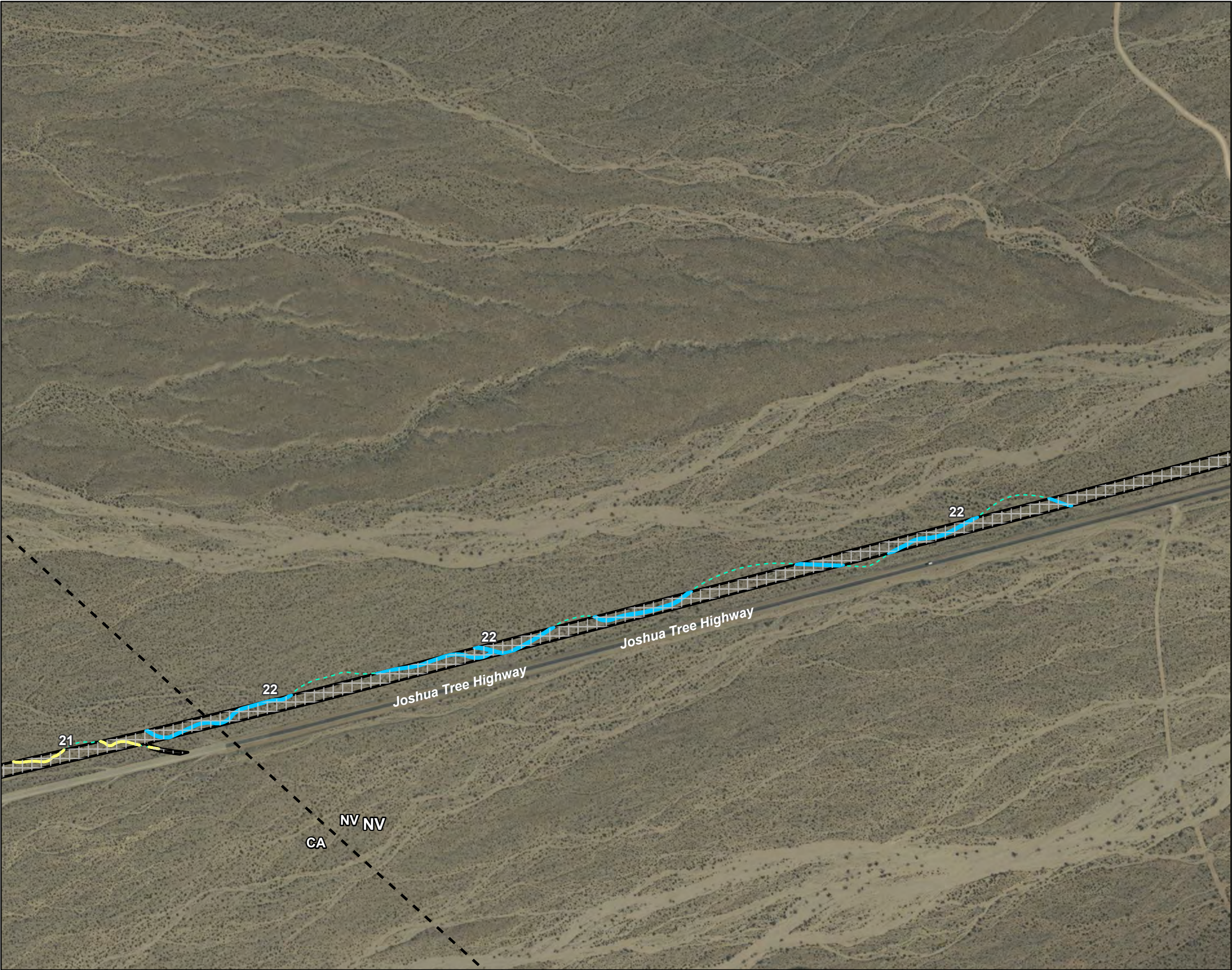
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Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

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

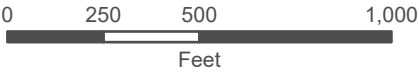
Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES





- Project Site
- Waterline ROW - Temporary Impact
- Non-Jurisdictional Ephemeral Feature
- Potential Interstate Waters - Ephemeral Feature
- Flowline



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

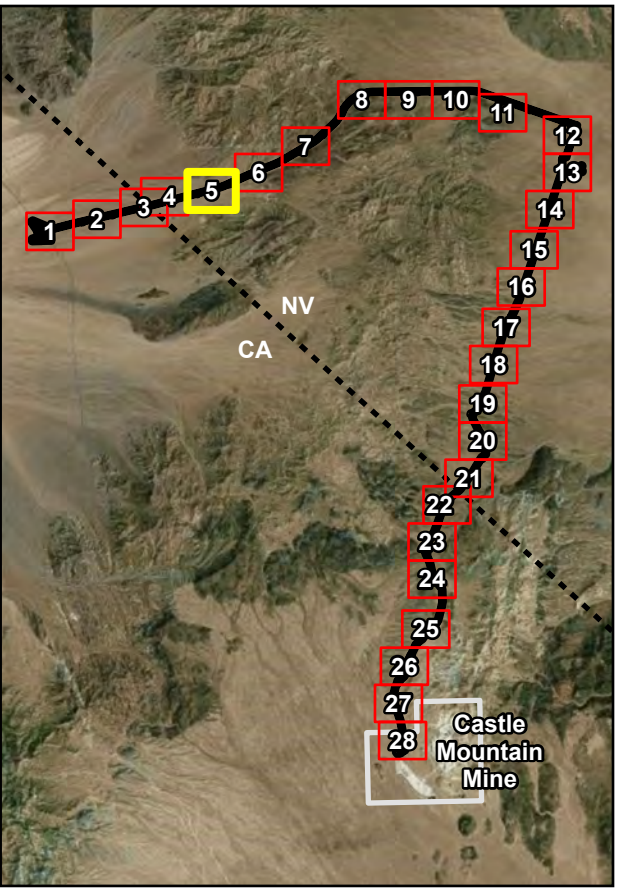
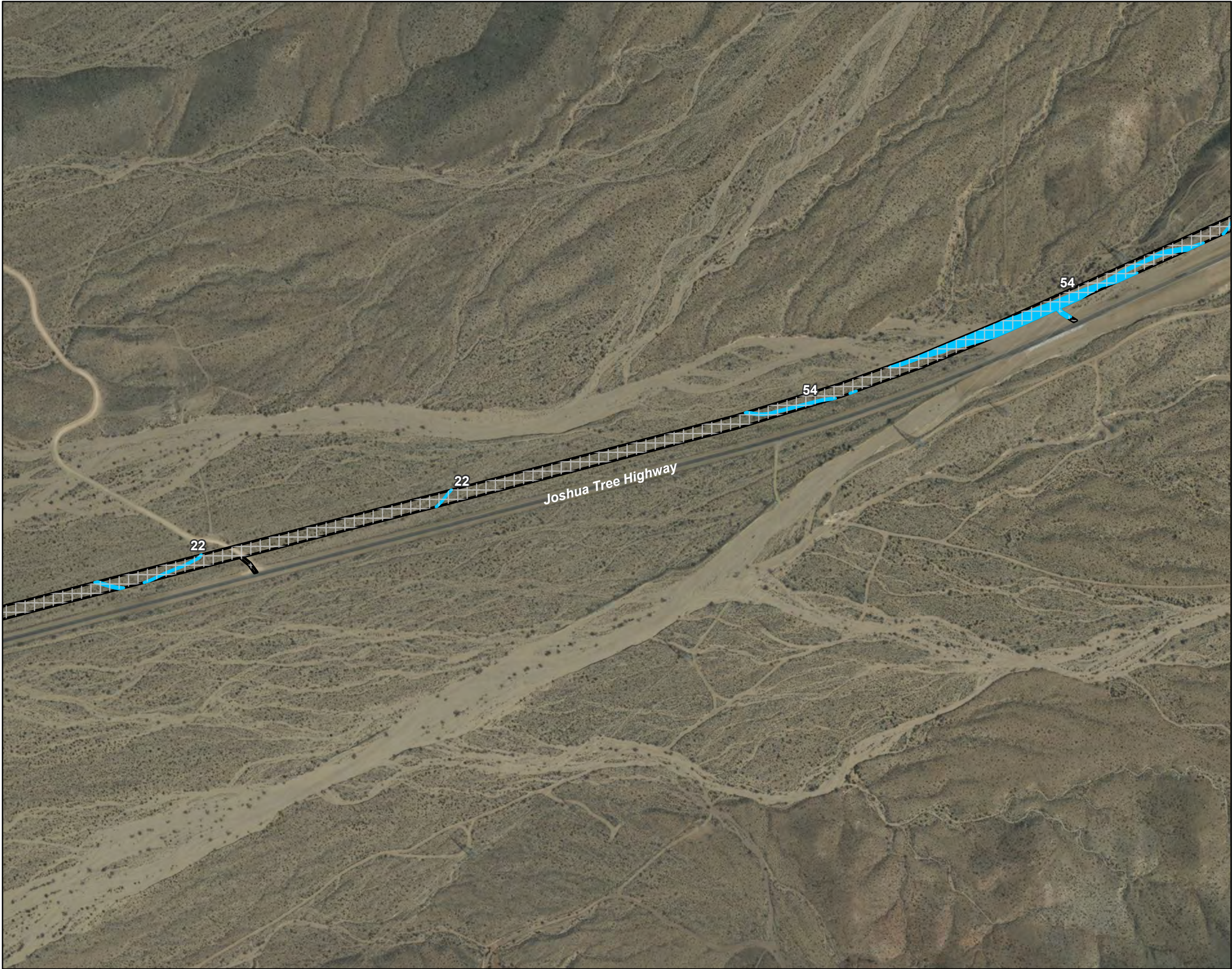
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 3 - Sheet 4



-  Project Site
-  Waterline ROW - Temporary Impact
-  Potential Interstate Waters - Ephemeral Feature



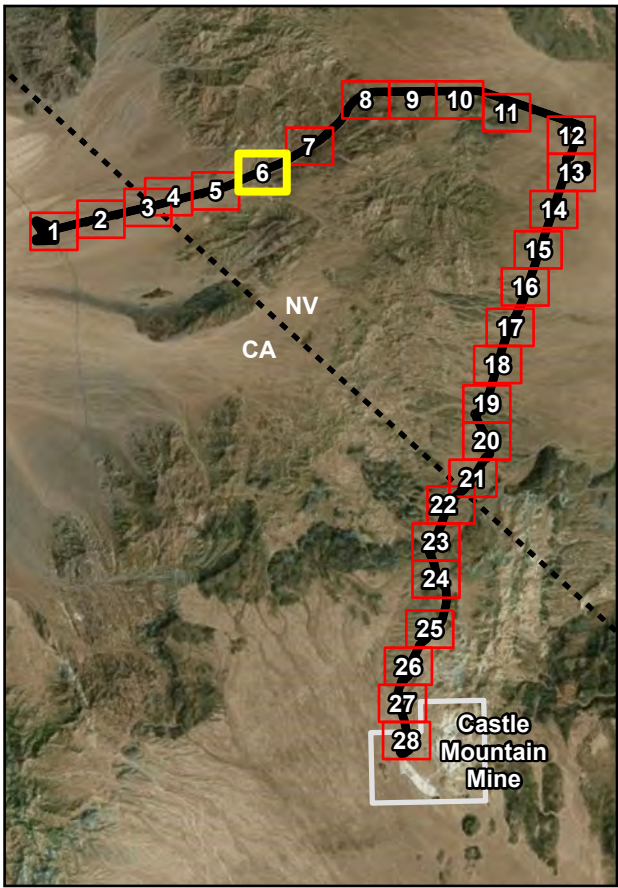
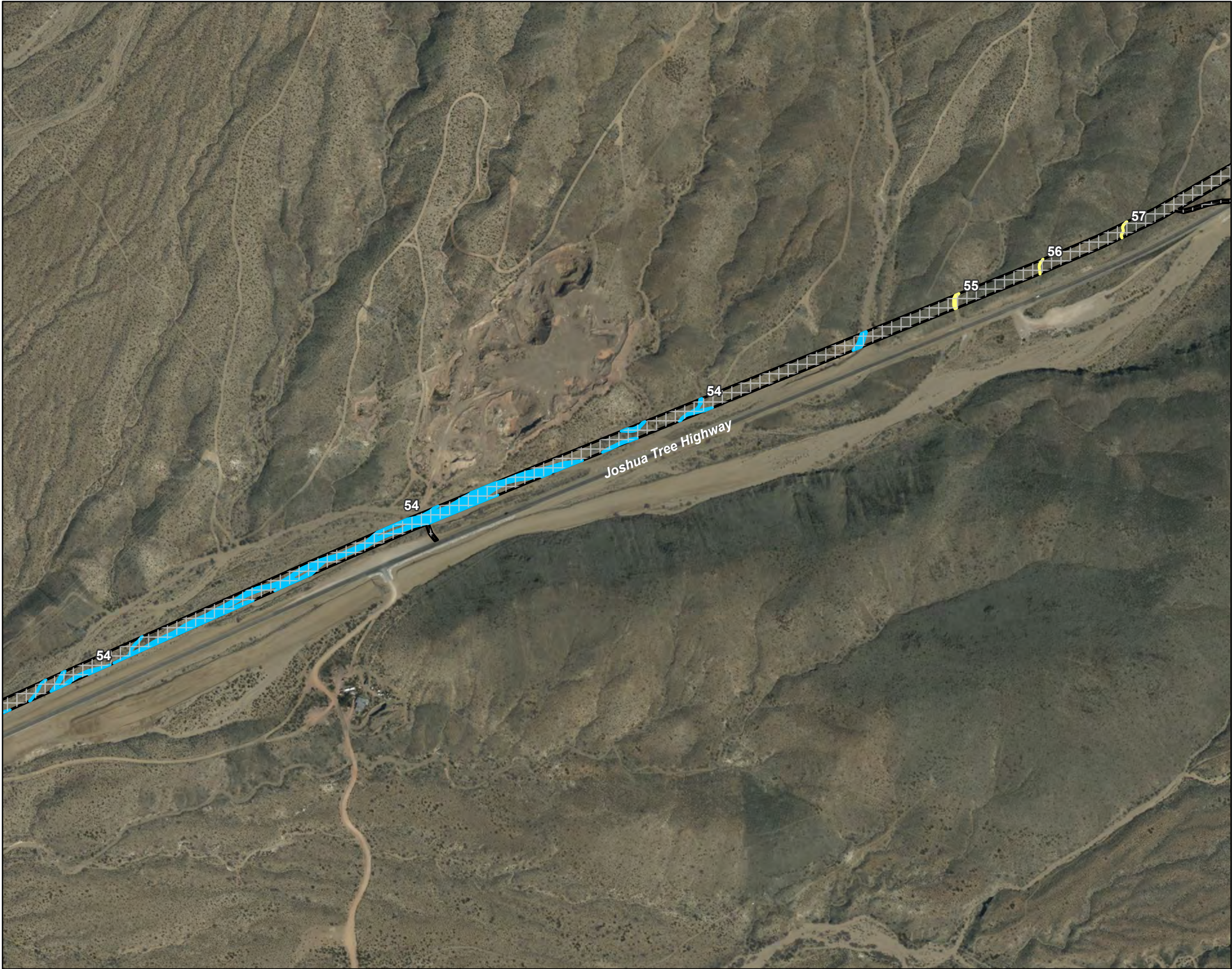
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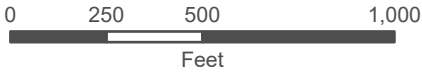
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Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

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

Corps Jurisdictional Delineation Impact Map



- Project Site
- Waterline ROW - Temporary Impact
- Non-Jurisdictional Ephemeral Feature
- Potential Interstate Waters - Ephemeral Feature



1 inch = 500 feet

Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026



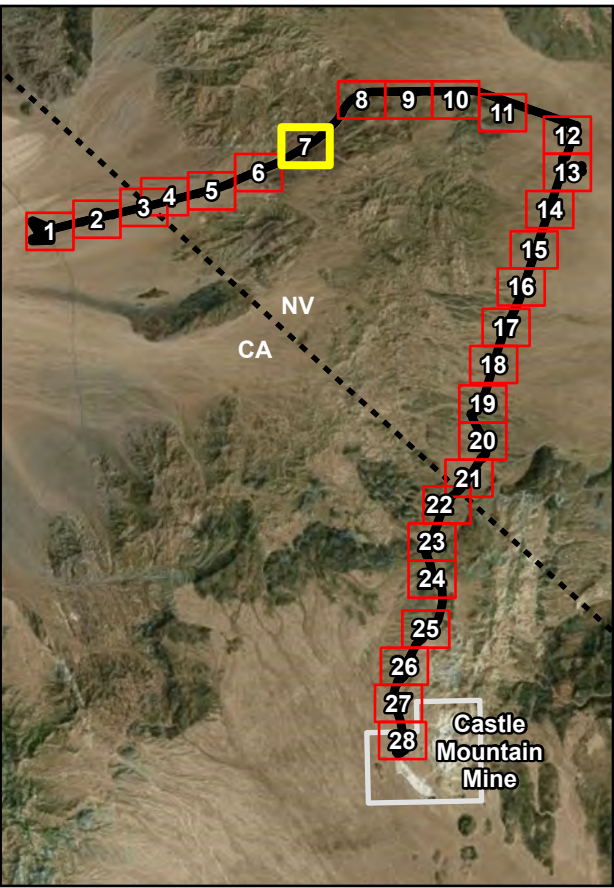
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

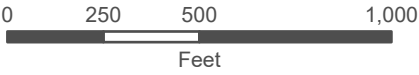
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Exhibit 3 - Sheet 6



-  Project Site
-  Waterline ROW - Temporary Impact
-  Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet

Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026



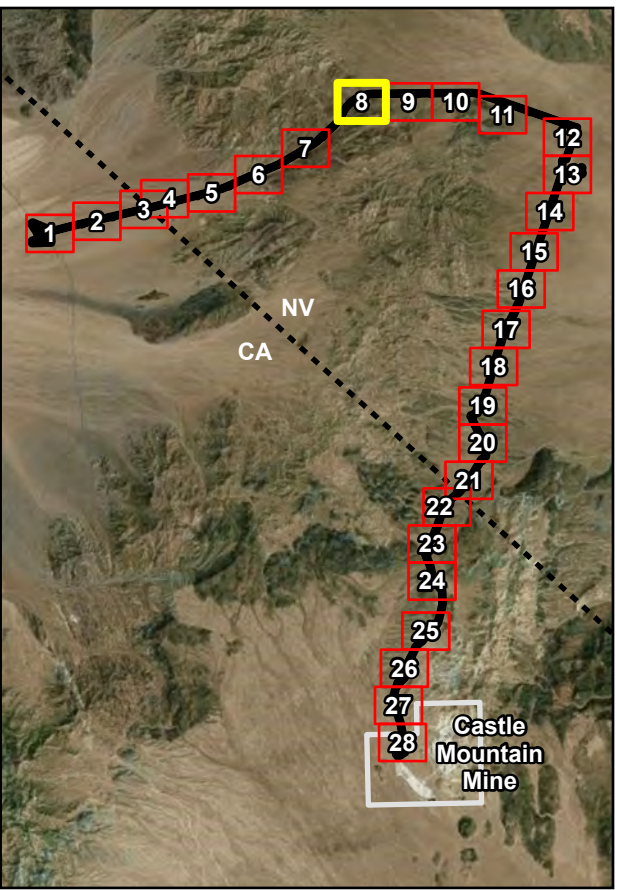
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

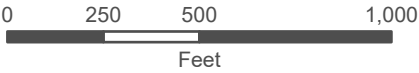
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Exhibit 3 - Sheet 7



-  Project Site
-  Waterline ROW - Temporary Impact
-  Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
 Projection: Lambert Conformal Conic
 Datum: NAD 1983 2011
 Map Prepared by: B. Gale, GLA
 Date Prepared: June 16, 2026

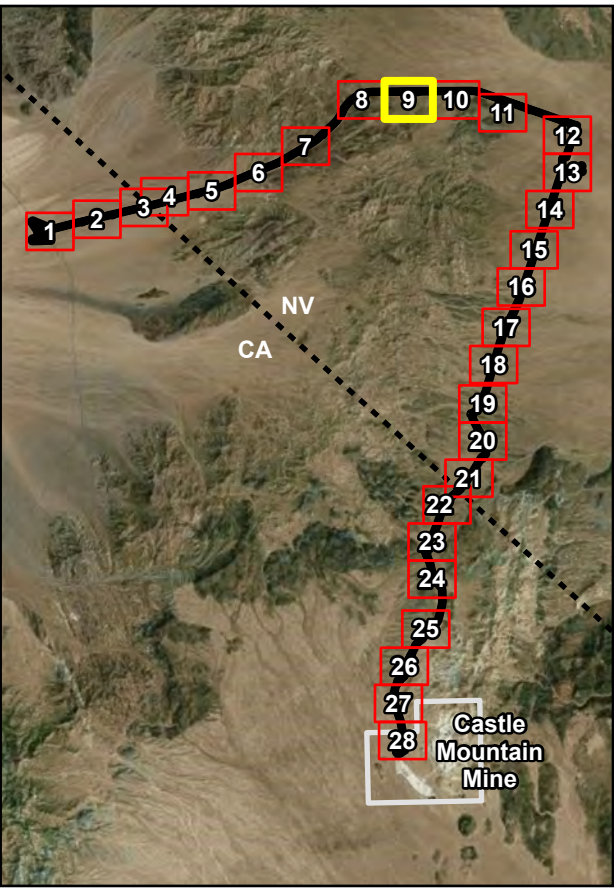
**IVANPAH UNDERGROUND WATERLINE
 AND 69KV OVERHEAD POWERLINE
 RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 3 - Sheet 8



-  Project Site
-  Waterline ROW - Temporary Impact
-  Non-Jurisdictional Ephemeral Feature



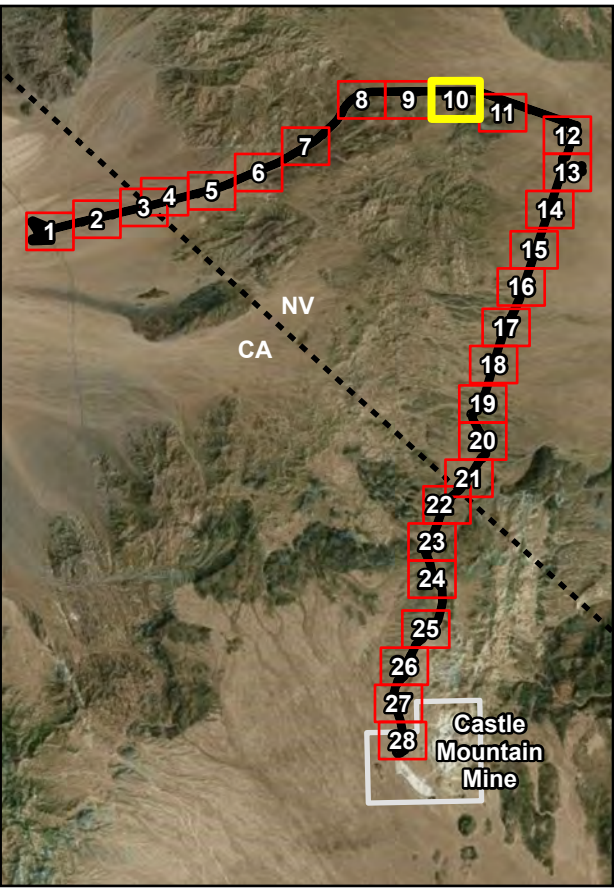
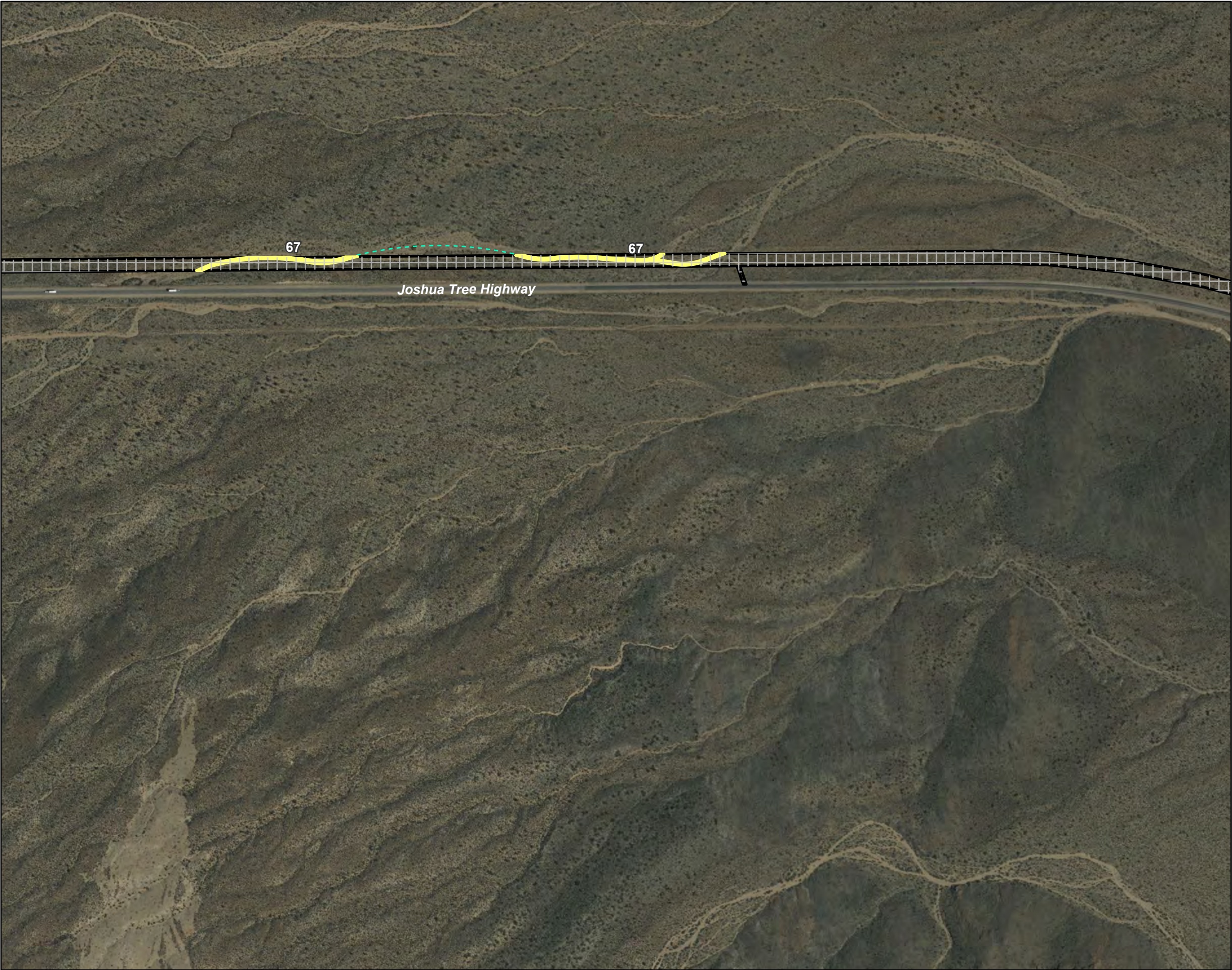
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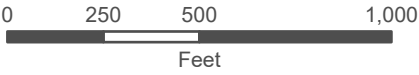
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Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

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

Corps Jurisdictional Delineation Impact Map



-  Project Site
-  Waterline ROW - Temporary Impact
-  Non-Jurisdictional Ephemeral Feature



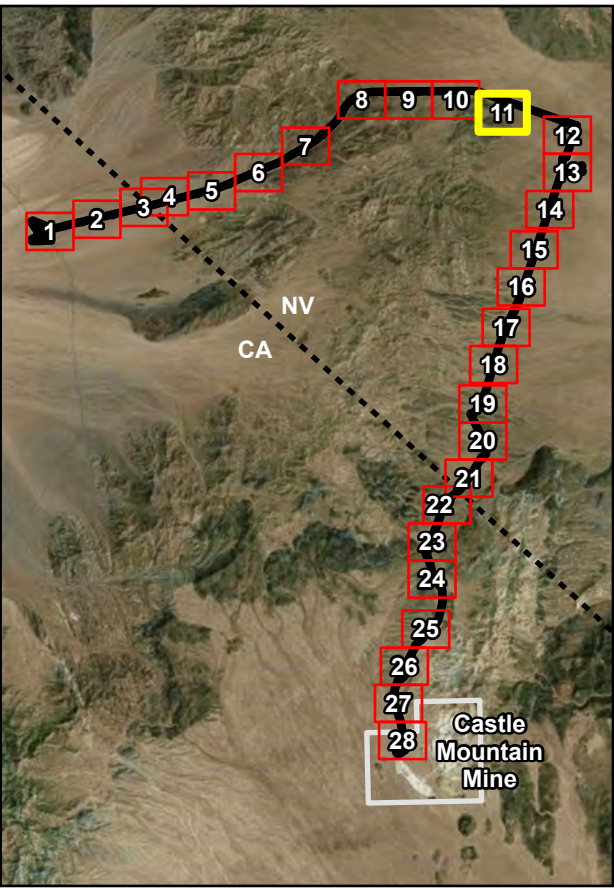
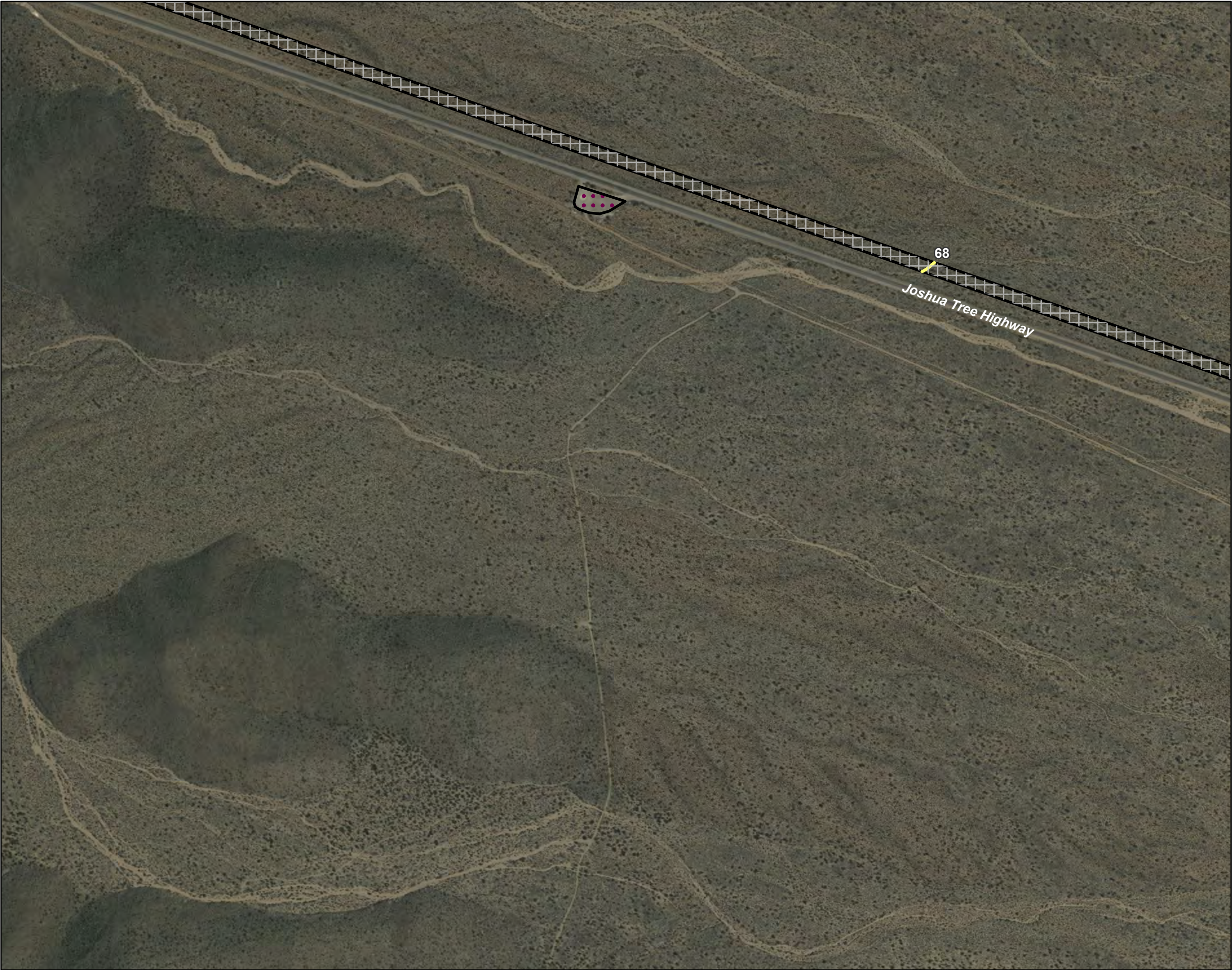
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Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

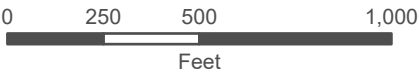


**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map



-  Project Site
-  Waterline ROW - Temporary Impact
-  Staging Area
-  Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

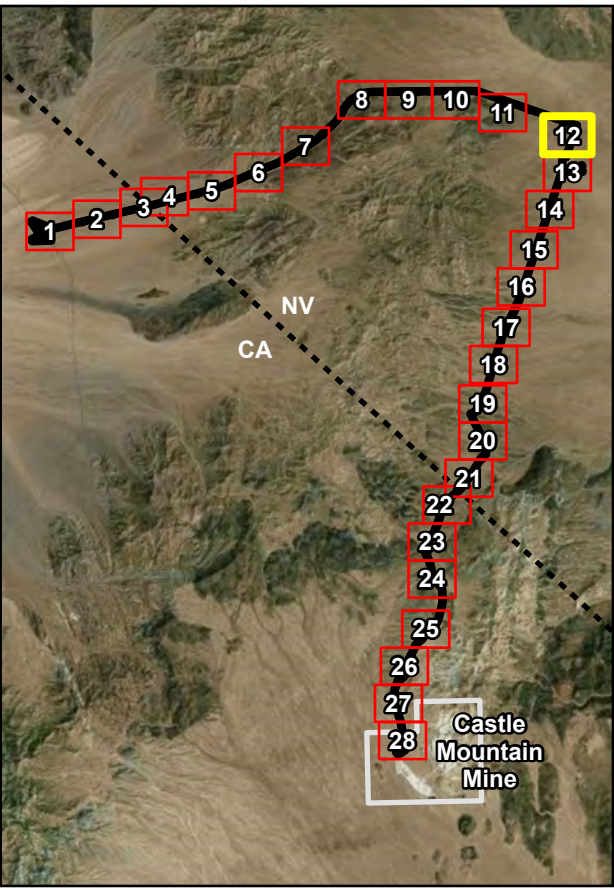
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

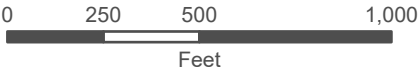
GLENN LUKOS ASSOCIATES



Exhibit 3 - Sheet 11



- Project Site
- Waterline ROW - Temporary Impact
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

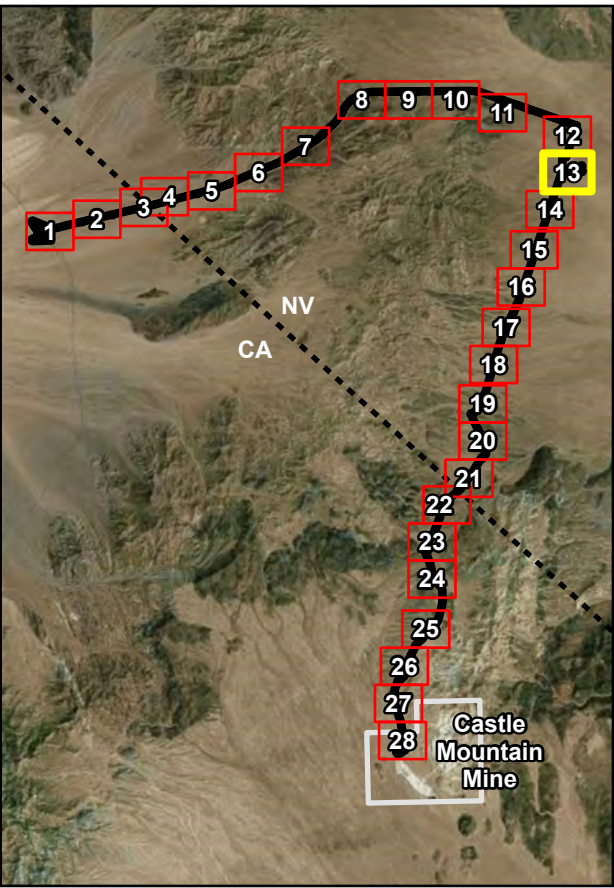
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

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Exhibit 3 - Sheet 12



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Staging Area
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

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

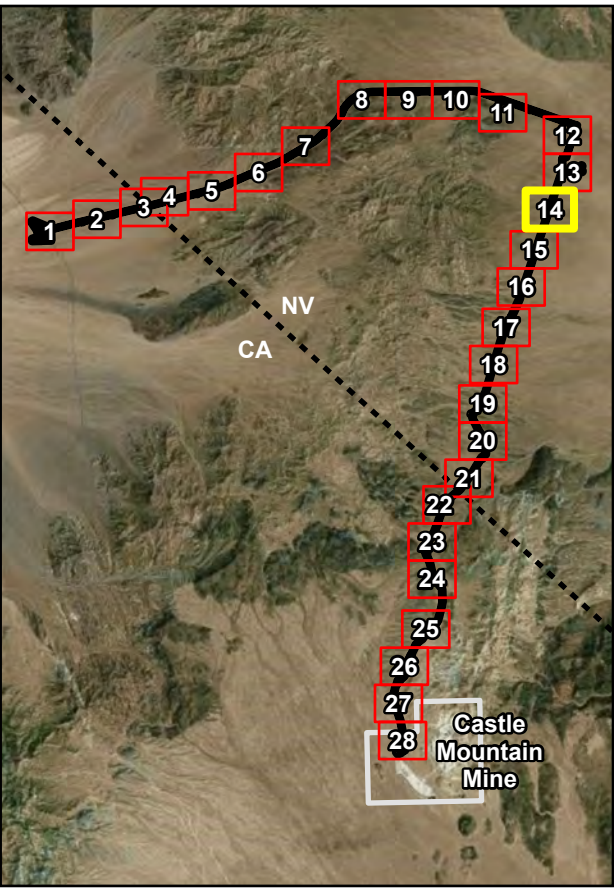
Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

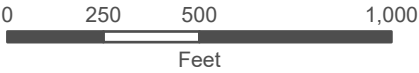


Exhibit 3 - Sheet 13

* 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 *
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

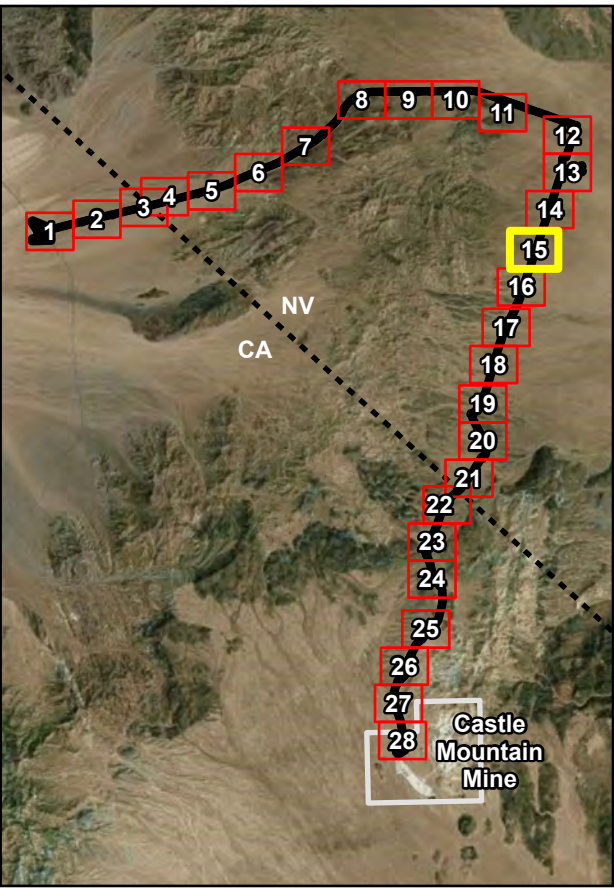
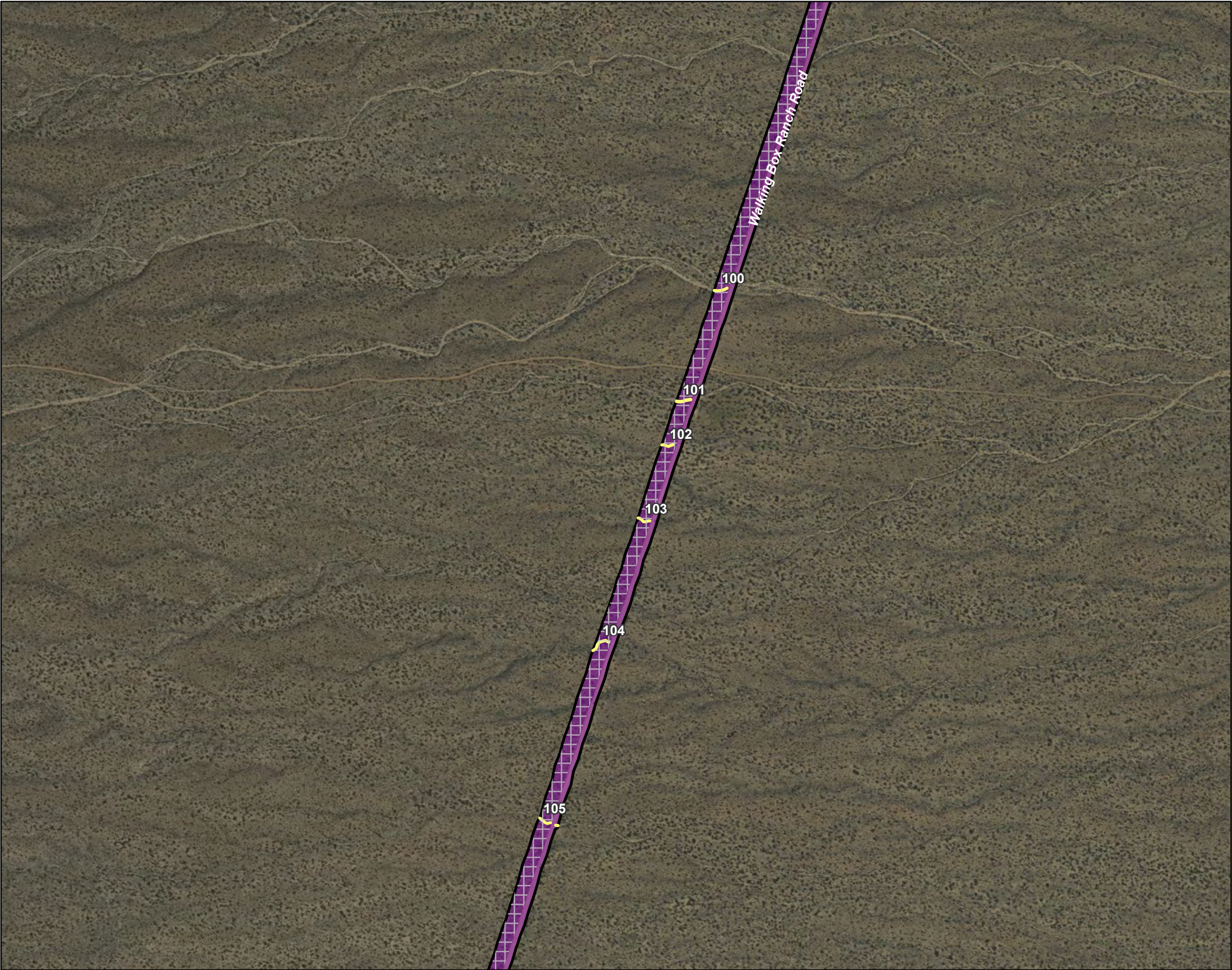
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

* 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.

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- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet

Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

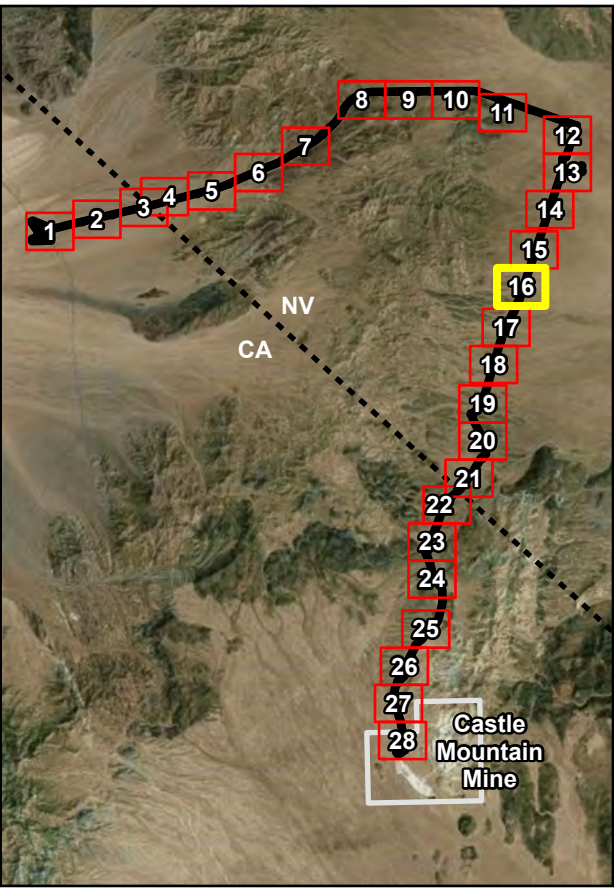


**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

Exhibit 3 - Sheet 15



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

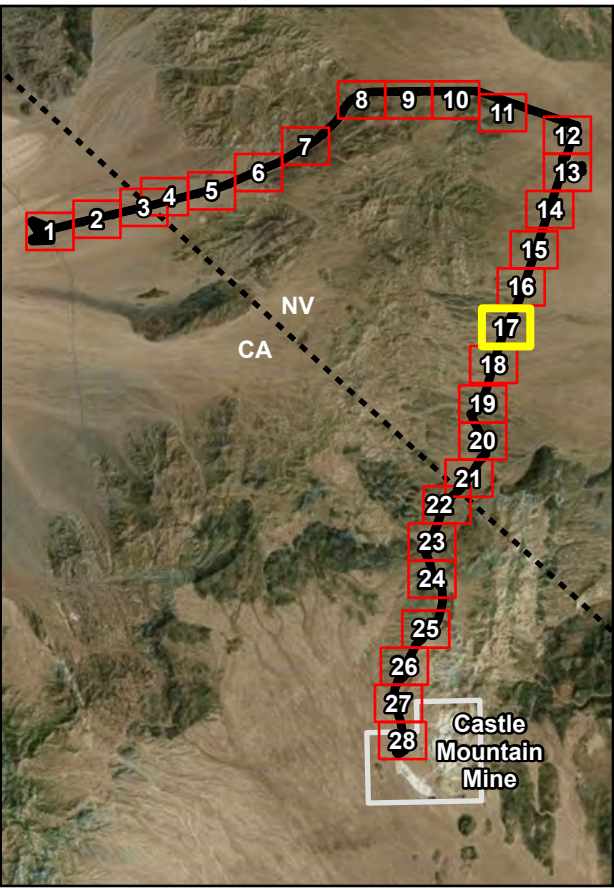
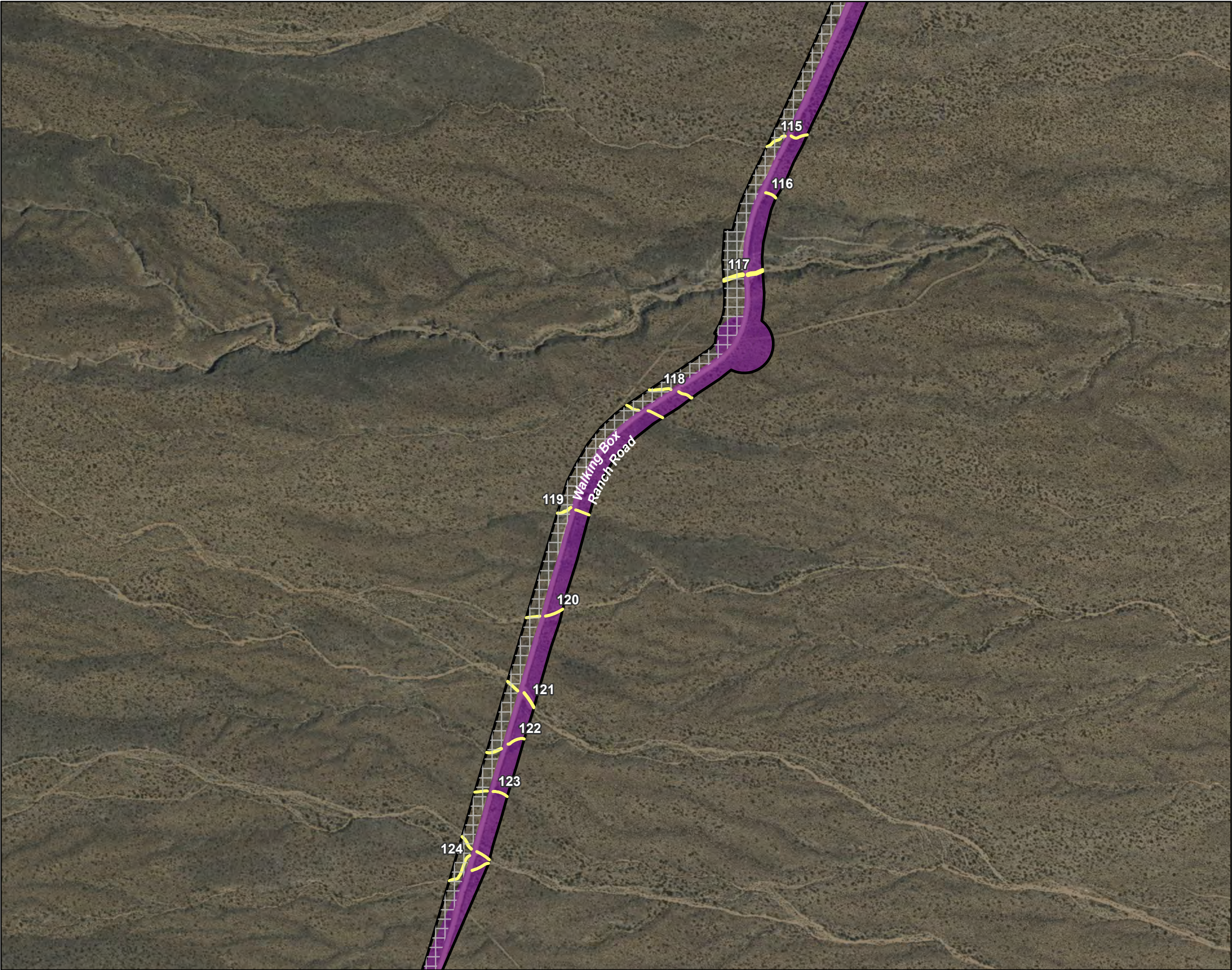
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

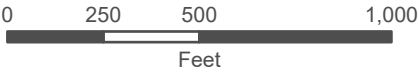
GLENN LUKOS ASSOCIATES

* 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.

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- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

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

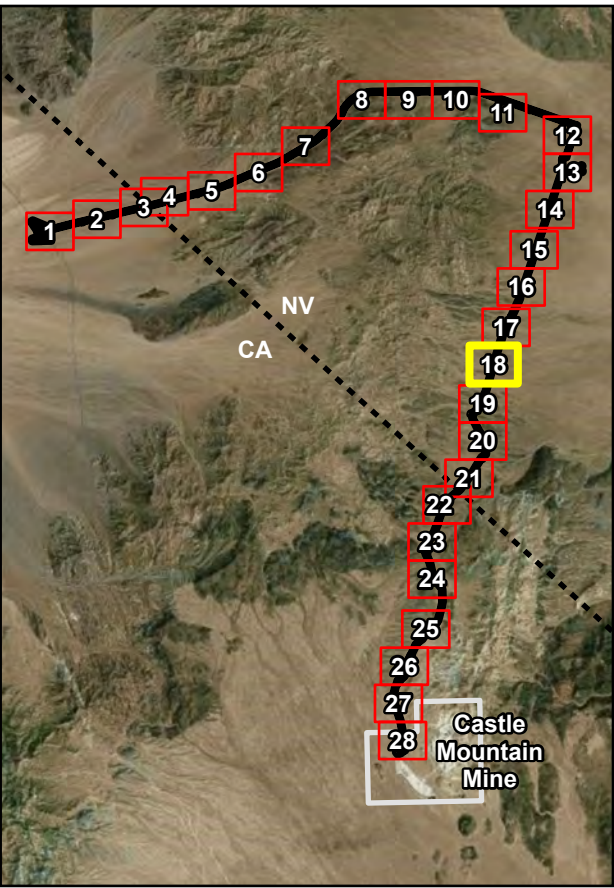
Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 3 - 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 *
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

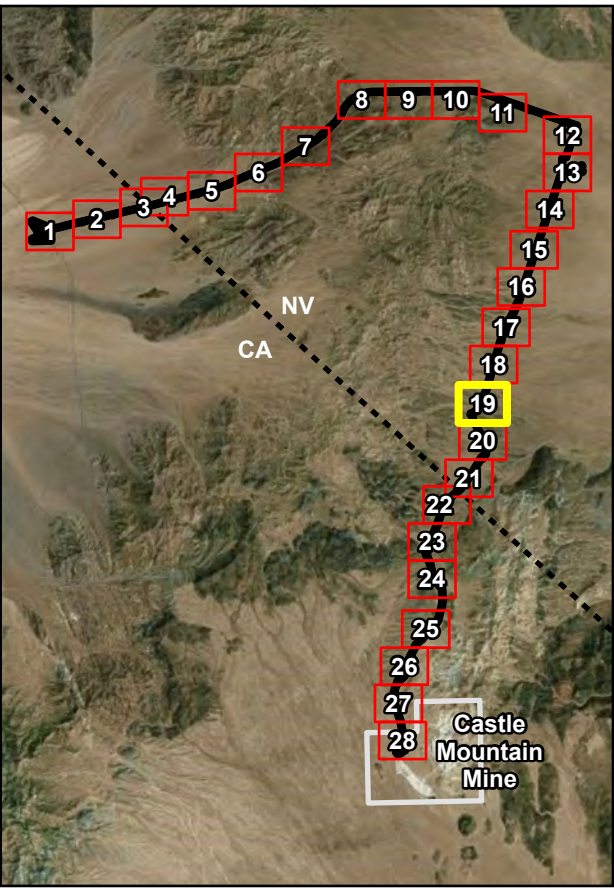
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

Exhibit 3 - 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.



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Staging Area
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet

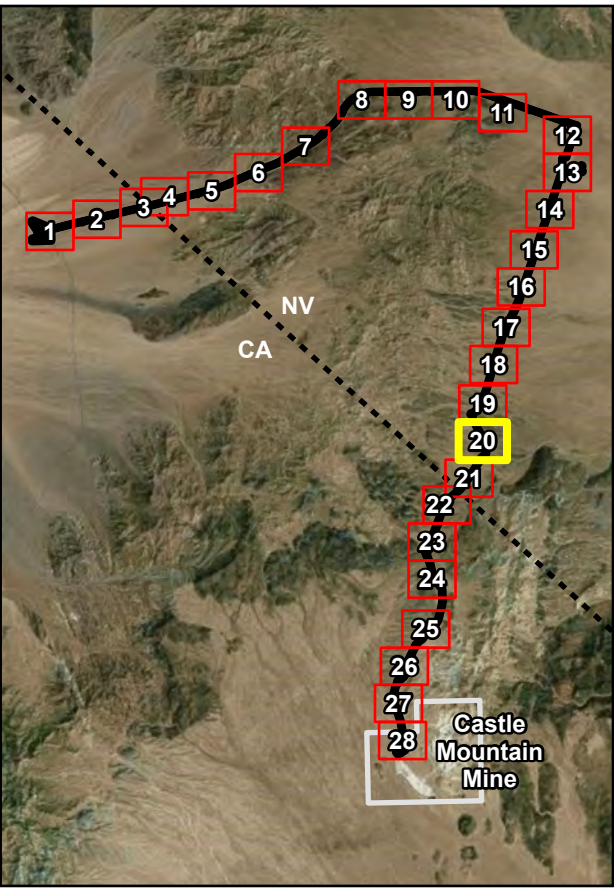
Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026



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

Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

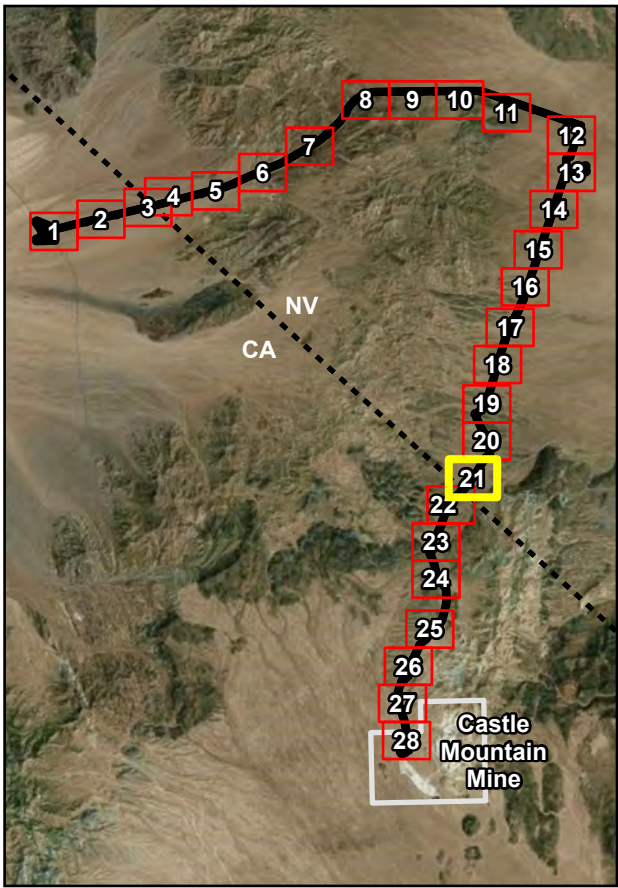
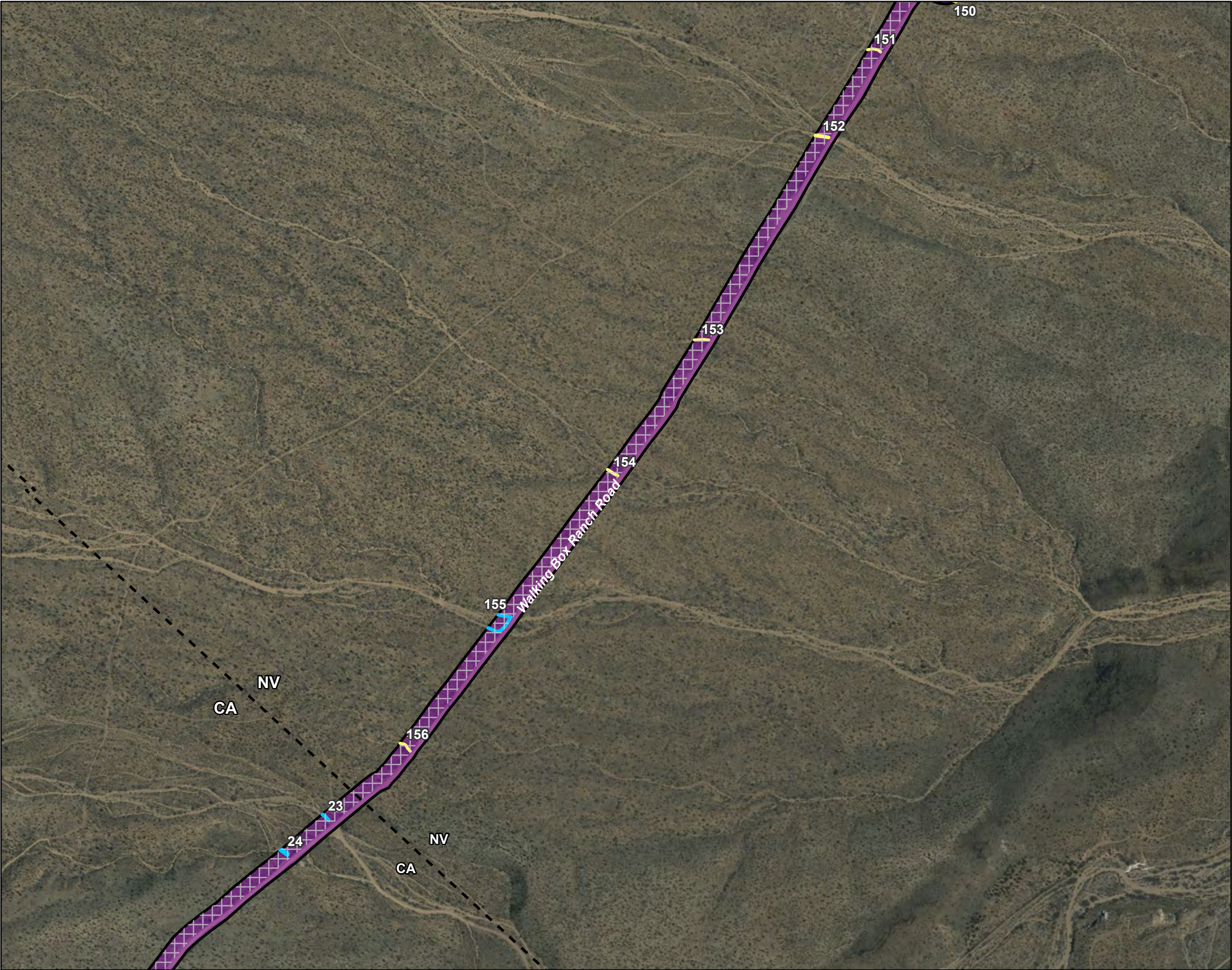
**IVANPAH UNDERGROUND WATERLINE
AND 69KV OVERHEAD POWERLINE
RIGHTS-OF-WAY PROJECT**

Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

* 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.

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- Project Site
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Non-Jurisdictional Ephemeral Feature
- Potential Interstate Waters - Ephemeral Feature



1 inch = 500 feet

Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026



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

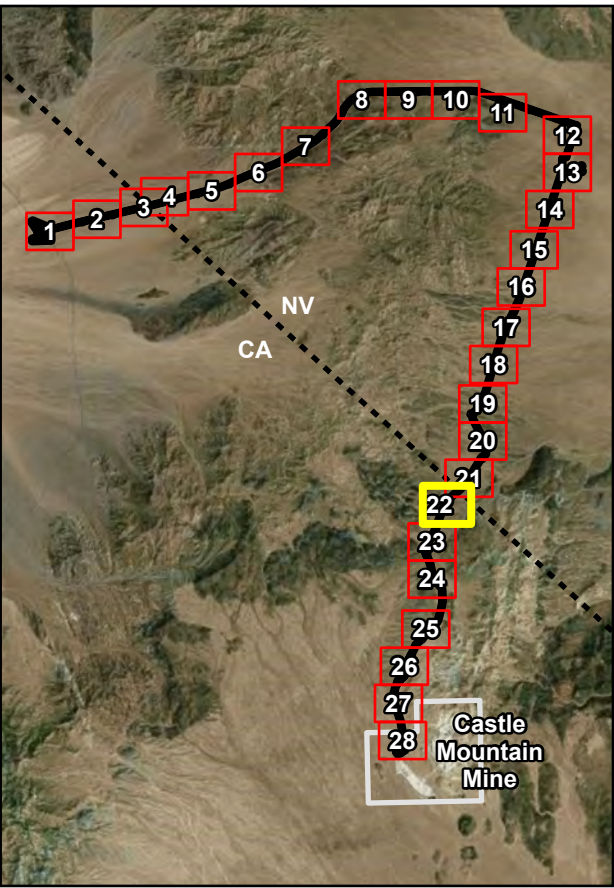
Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 3 - Sheet 21

* 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 *
- Non-Jurisdictional Ephemeral Feature
- Potential Interstate Waters - Ephemeral Feature

0 250 500 1,000
Feet

1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

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

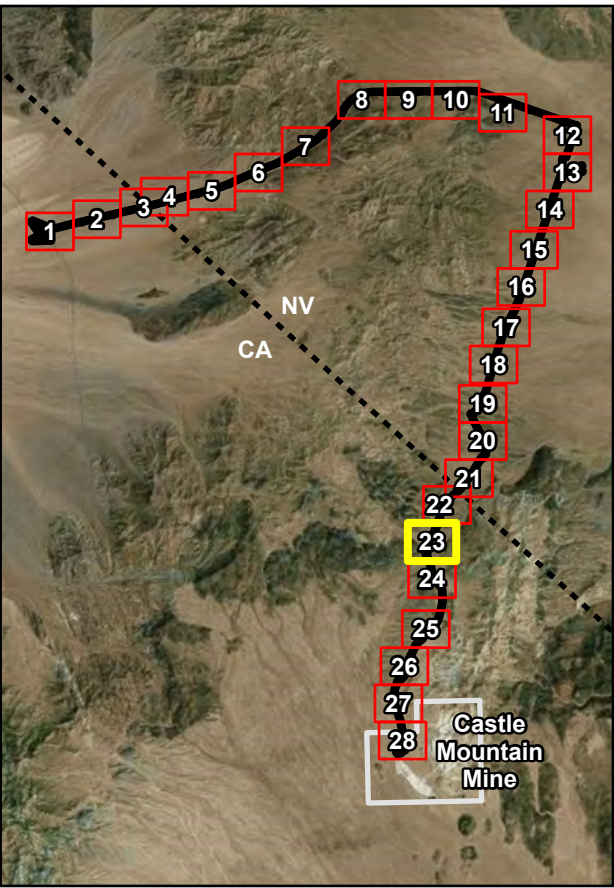
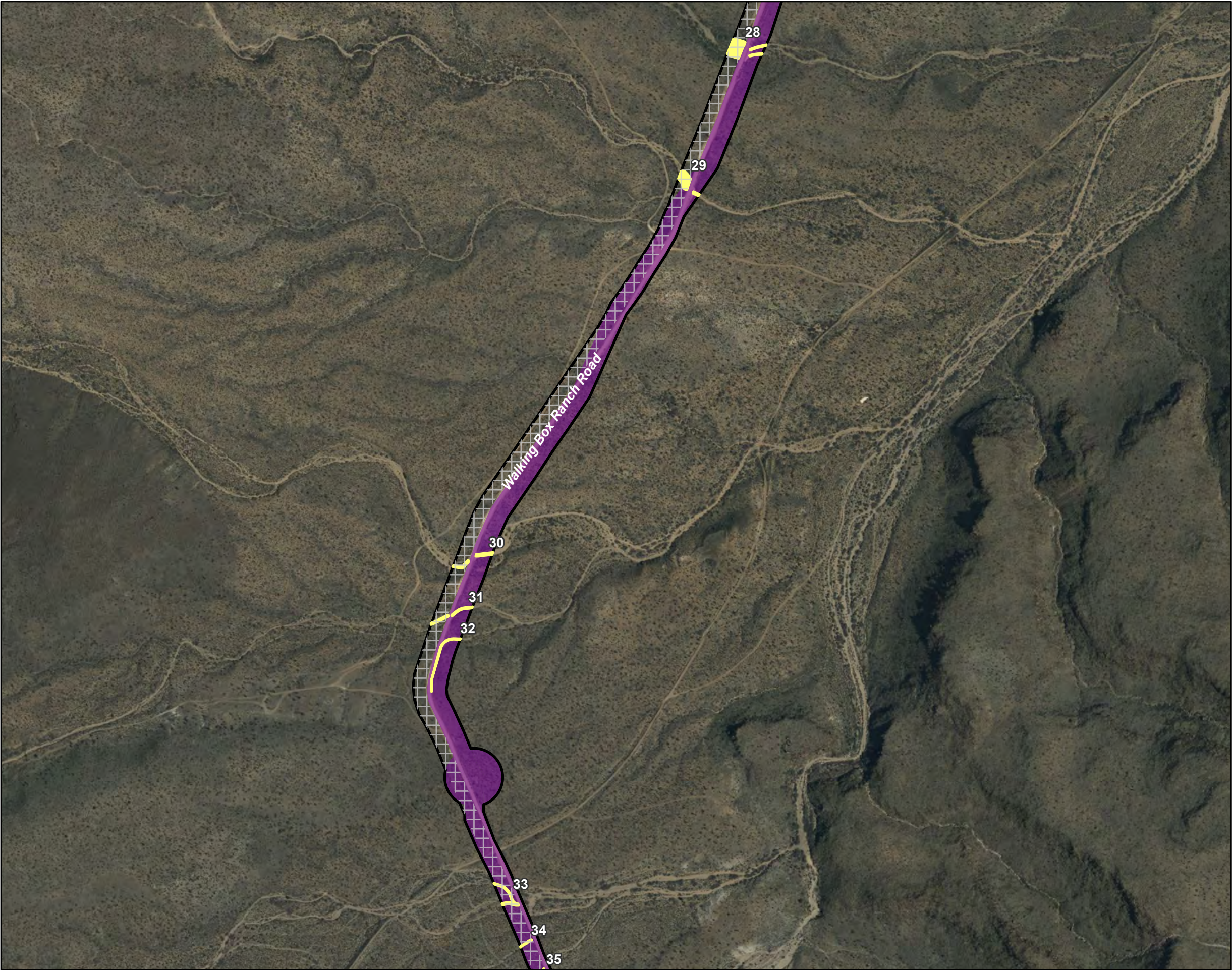
Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

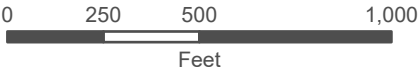


Exhibit 3 - Sheet 22

* 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 *
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

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

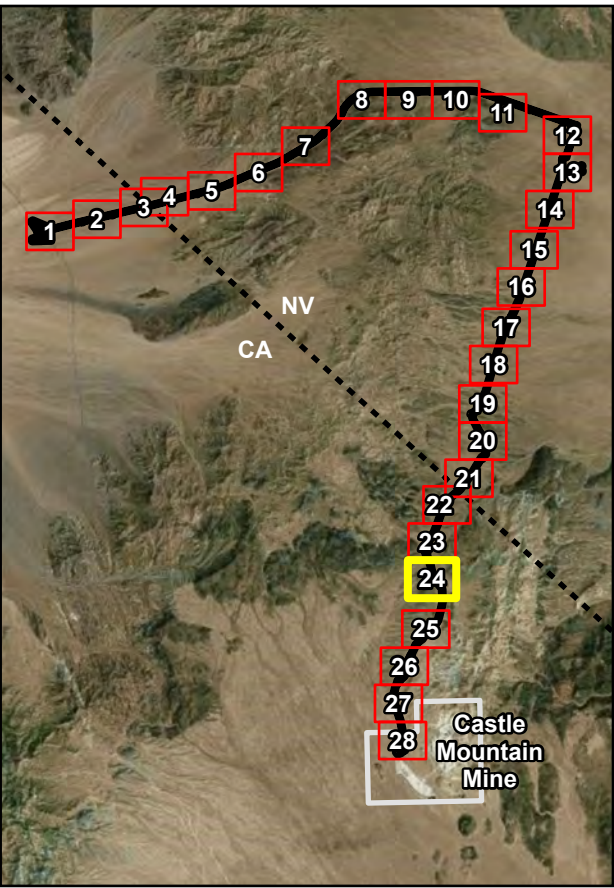
Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 3 - Sheet 23

* 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 *
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet

Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026



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

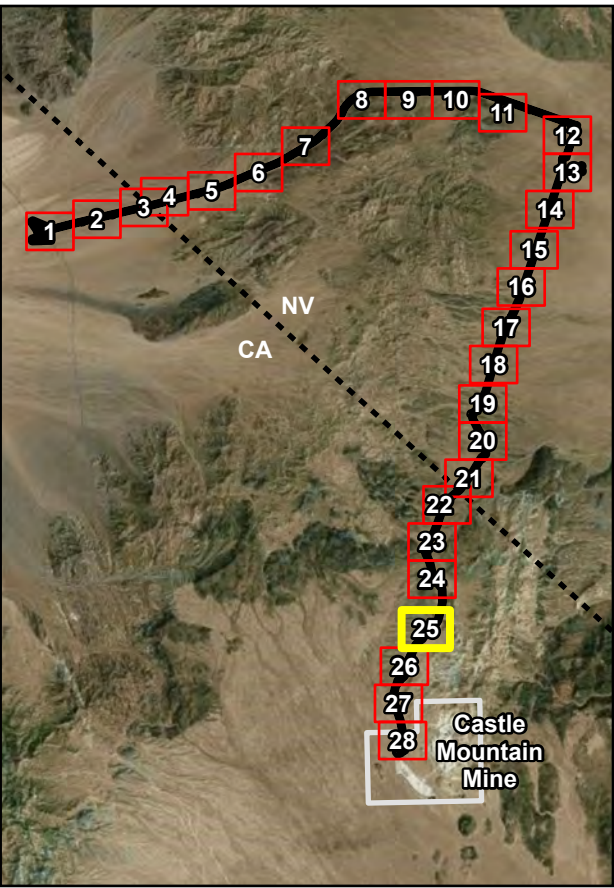
Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



Exhibit 3 - Sheet 24

* 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 *
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

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

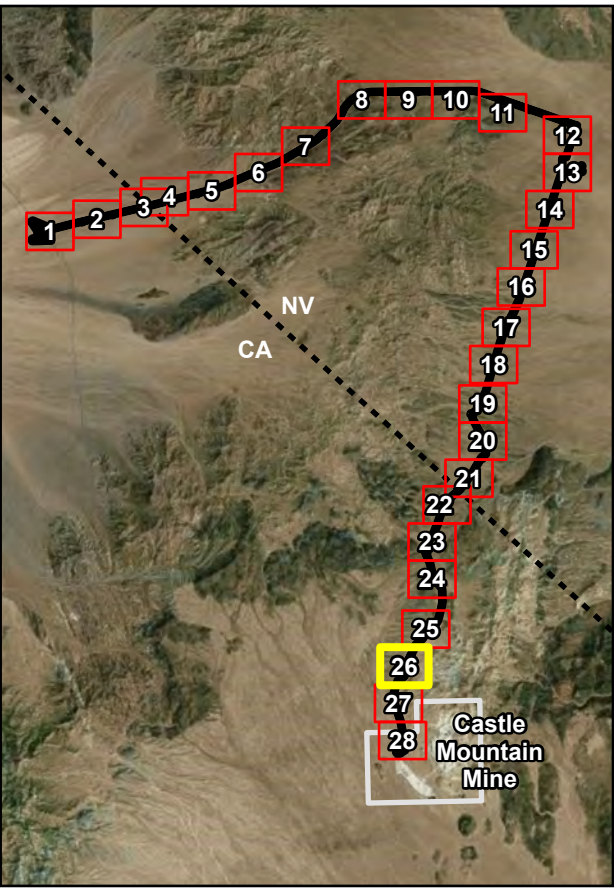
Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

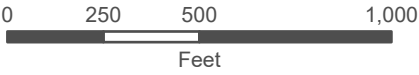


Exhibit 3 - Sheet 25

* 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 *
- Non-Jurisdictional Ephemeral Feature
- Flowline



1 inch = 500 feet

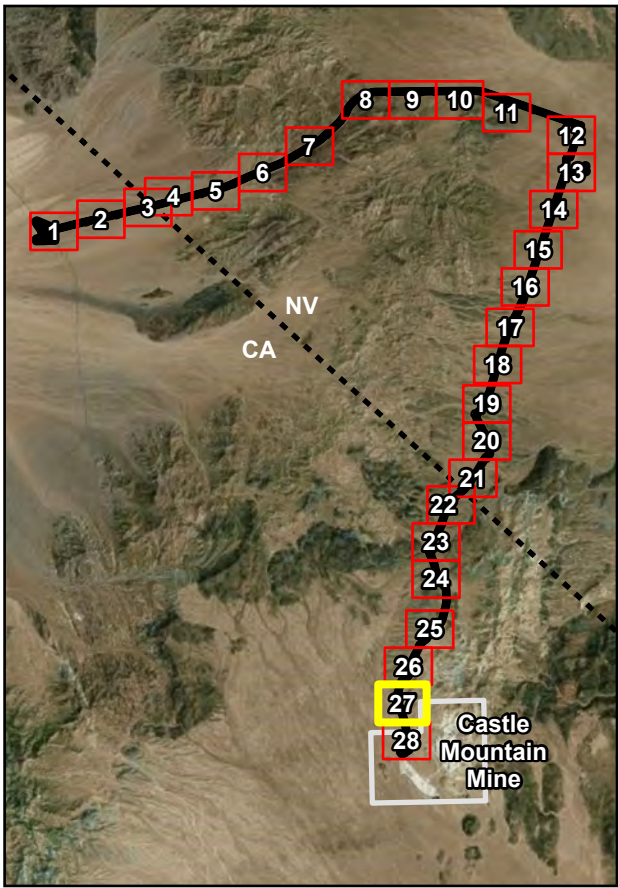


Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

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

Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES



- Project Site
- Castle Mountain Mine
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Non-Jurisdictional Ephemeral Feature



1 inch = 500 feet



Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026

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

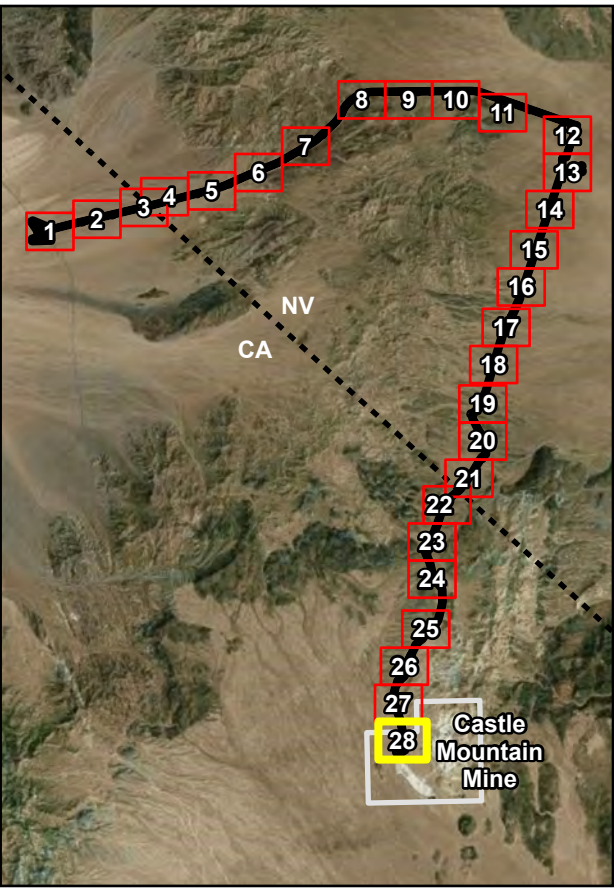
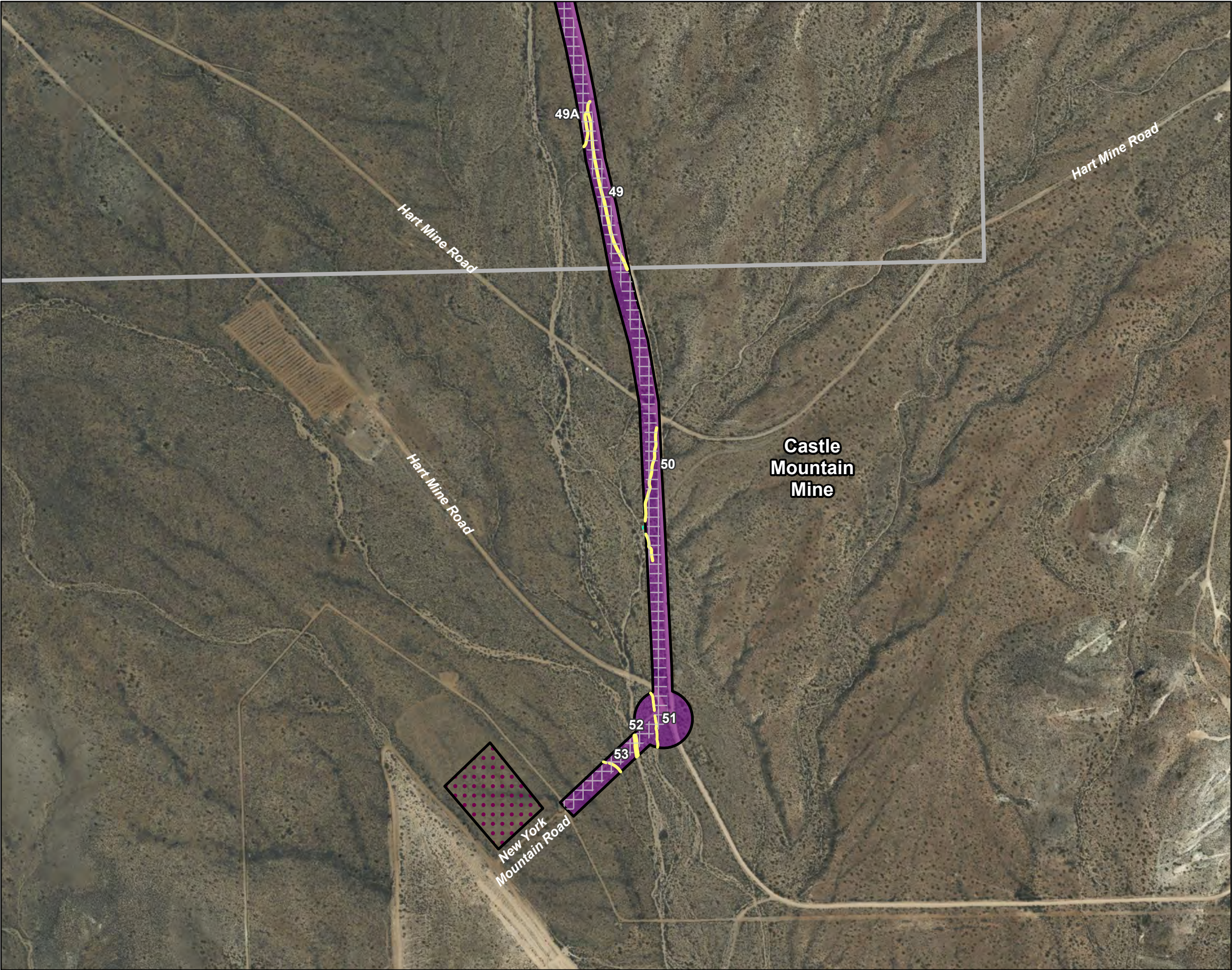
Corps Jurisdictional Delineation Impact Map

GLENN LUKOS ASSOCIATES

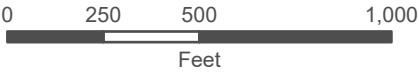


Exhibit 3 - Sheet 27

* 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
- Castle Mountain Mine
- Waterline ROW - Temporary Impact
- Overhead Powerline ROW *
- Staging Area
- Non-Jurisdictional Ephemeral Feature
- Flowline



1 inch = 500 feet

Coordinate System: State Plane 5 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD 1983 2011
Map Prepared by: B. Gale, GLA
Date Prepared: June 16, 2026



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

Corps Jurisdictional Delineation Impact Map

* 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.

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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.

