



Environment

Submitted to:
Basin Electric Power Cooperative
Laramie River Station
Wheatland, WY

Submitted by:
AECOM
Fort Collins, CO
60732883
January 17, 2025

Basin Electric Power Cooperative Laramie River Station

Coal Combustion Residual Surface Impoundment Annual Inspection Report – 2024

Inspection Completed by:

I certify that this report has been prepared in accordance with 40 Code of Federal Regulations (CFR) 257.83(b)(2) requiring a written Annual Inspection Report prepared by a Qualified Professional Engineer (QPE) as set forth in the *Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments* for the Basin Electric Power Cooperative (BEPC) Laramie River Station (LRS) surface impoundments for 2024.



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Environmental Engineer
Wyoming PE #19479
Expires 12-31-2026



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List of Acronyms

AECOM	AECOM Technical Services, Inc.
amsl	above mean sea level
BAP	bottom ash pond
BEPC	Basin Electric Power Cooperative
CCR	coal combustion residual
CFR	Code of Federal Regulations
E-EHP	East Emergency Holding Pond
EL-EHP	Eastern Lobe of East Emergency Holding Pond
FGD	flue gas desulfurization
IDF	InFlow Design Flood
ft	foot or feet
LRS	Laramie River Station
QPE	Qualified Professional Engineer
W-EHP	West-Emergency Holding Pond
yr	year

1.0 Introduction

In accordance with 40 Code of Federal Regulations (CFR) 257.83(b)(2), the purpose of this document is to fulfill the requirements for an Annual Inspection Report prepared by a Qualified Professional Engineer (QPE) to ensure the design, construction, operation, and maintenance of the Basin Electric Power Cooperative (BEPC) Laramie River Station (LRS) surface impoundments is consistent with recognized and generally accepted good engineering standards.

LRS operates three coal-fired boilers, resulting in the production of coal combustion residuals (CCRs). CCRs are defined in 40 CFR 257.53 as: “CCR means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.”

CCRs generated at LRS (and thus regulated under 40 CFR 257) include bottom ash, flue gas desulfurization (FGD) materials, and fly ash.

1.1 CCR Production and Handling

On a daily average, approximately 1,200 tons of FGD materials and fly ash are generated at LRS. The moisture conditioned CCRs (fly ash and FGD material) are transported by haul truck to the on-site LRS landfill, where the CCRs are dumped, spread, and compacted. Bottom ash is managed in surface impoundments adjacent to the landfill. The CCR landfill is addressed in a separate Annual Inspection Report.

1.2 Purpose and Use of CCR Units

Bottom ash and boiler slag from LRS are sluiced to Bottom Ash Pond (BAP) 3. Water from BAP 3 is decanted into BAPs 1 and 2, and then recirculated for various plant processes. Flue gas emission control residuals and water treatment plant lime slurry are sluiced in the previously retrofit East-Emergency Holding Pond (E-EHP).¹

1.3 CCR Unit Watershed

The general area around LRS consists of a physiographic feature called the Wheatland Flats that covers approximately 125 square miles. The Wheatland Flats are made up of seven distinct river terraces that rise 25 to 160 feet above the present stream levels of the Laramie River. The entire LRS Site is constructed on the fourth and fifth river terraces. As such, the CCR surface impoundments are located within the Laramie River watershed. **Figure 1** shows the LRS property on a composite United States Geological Survey 7.5 minute topographic map.

1.4 Facility Description

The five CCR surface impoundments at LRS (BAP-1, BAP-2, BAP-3, W-EHP, and E-EHP) were constructed in 1980, during the original construction of the LRS. The impoundment dikes were largely constructed by excavating the impoundment basins and placing the excavated material directly along the perimeter of the basins to form the impoundment dikes. BAP-1 and 2 and the E-EHP were retrofit in

¹ It should be noted that the “Coal Combustion Residual Surface Impoundment Annual Inspection Report – 2023” (2023 CCR Report) (BEPC 2024) incorrectly referenced the West – Emergency Holding Pond (W-EHP) in Section 1.2. The 2023 CCR Report should have read “Flue gas emission control residuals and water treatment plant lime slurry are sluiced in the East-Emergency Holding Pond (E-EHP).”

accordance with the CCR Rule requirements in 2020 and 2021 (AECOM 2020, 2022). Because they were considered unlined, BAP-3 and the W-EHP ceased accepting waste prior to April 11, 2021.

BEPC completed partial retrofit of BAP-3 during the 2022 construction season and AECOM Technical Services, Inc. (AECOM) completed retrofit construction certification in January 2023. As stated in the "CCR Construction Certification, Bottom Ash Pond 3" (AECOM 2023):

CCR and CCR impacted materials were removed from the eastern portion of the footprint of BAP 3. A new central berm was constructed in BAP 3 with liner installed on both sides of the new berm. CCR and CCR impacted materials were consolidated from the eastern portion of BAP 3 into the western portion of BAP 3 with excess materials hauled to and disposed of in the onsite landfill. Final cover was installed on the West Hill. Materials removed included bottom ash and other CCR materials, the existing rip rap and cover materials, the existing membrane liner system in the eastern portion and below the central berm. Upon removal of these layers, the exposed subgrade was visually inspected for the presence of any CCR materials or any other materials which needed to be removed to prepare the subgrade. Once subgrade had been prepared, the central berm was constructed from onsite soils and a liner system consisting of a geocomposite clay liner (GCL) and a synthetic membrane liner were installed to create a composite liner system in accordance with section 257.71 of the CCR Rule. The West Hill was capped with a cover system consisting of a synthetic membrane, a minimum of 18 inches of soil infiltration layer and a minimum of 6 inches of topsoil.

BAP-1 and BAP-2 have surface areas of approximately 15.5 and 30.9 acres, respectively, and are separated by a north-south oriented divider dike. The impoundment dikes for BAP-1 and BAP-2 have an approximate 23-ft maximum structural height (BEPC 2016).

BAP-3 is located directly south of BAP-1 and BAP-2 and has a surface area of approximately 35.4 acres after the partial retrofit. The impoundment dike for BAP-3 has an approximate 25-ft structural height (BEPC 2016).

The E-EHP and W-EHP have surface areas of approximately 27.9 and 30.1 acres, respectively, and are separated by a northwest-southeast oriented divider dike. Drainage and excavation of materials in the W-EHP and the eastern lobe of the East-Emergency Holding Pond (EL-EHP) began in May 2024 as part of a liner retrofit project. W-EHP and EL-EHP are currently undergoing excavation and the CCR sediment material from the ponds is only placed in the active area of the CCR Landfill. Post-retrofit, the final geometry of W-EHP is expected to be similar to the respective historical geometry and remain within the current footprint. The EL-EHP material and liner is being completely removed, area regraded to not retain water and seeded to grass. The project is projected to finish in Spring 2025.

1.4.1 Foundation and Abutment Materials

Surface geology in the vicinity of LRS consists of Quaternary-age alluvial terrace sand, colluvium, and loess deposits, underlain by the bedrock of the Arikaree Formation (lower Miocene/Oligocene). The colluvium and loess deposits typically consist of fine-grained sands, silty sands, and silts with intermittent deposits of clay and gravel with thicknesses reportedly ranging from about 0 to 50 feet. Colluvial soils are typically identified as loose, unconsolidated deposits of silt, sand, and gravel that have accumulated at the base of hill slopes and ridges through erosional processes (rainwash, downward creep, etc.). Loess deposits are formed by the accumulation of wind-blown dusts and are composed of predominantly silt-sized particles. The Arikaree Formation typically consists of light gray to tan, fine-grained, poorly bedded sandstone containing numerous magnetite grains, with some lenses of siltstone, limestone, and tuff.

The engineering properties of the foundation and abutment construction materials can be reviewed in the October 2016 “Coal Combustion Residual Surface Impoundment History of Construction Documentation” (BEPC 2016).

1.4.2 Spillways and Diversion Features

LRS is a zero-discharge facility. No spillways are present. The CCR units are all above grade; as such, diversion structures are not used. In 2016, the storage capacity of the impoundments was evaluated for a 24-hour duration design storm for the 1,000-year (yr) Inflow Design Flood (IDF) using an AutoCAD Civil3D computer model. The computer model evaluated the ability of the ponds to collect and control the 1,000-yr IDF under existing operational and maintenance procedures. The Civil3D model results for the impoundments indicate that all the CCR units have sufficient storage to adequately manage inflows during peak discharge conditions created by the 1000-yr IDF. Therefore, the spillway requirements in 257.73(d)(1)(v)(A) and (B) are not applicable to the impoundments at LRS.

2.0 Review of Existing Information

Existing information regarding the status and condition of the LRS surface impoundments was reviewed as part of the QPE annual inspection effort. The evaluation included review of the facility CCR Rule operating record, files associated with previous state permitting, and past inspection reports. No indications of structural instability have been observed to date for any of the CCR units at LRS.

2.1 CCR Unit Documents and Operating Records

Below is a list of documents reviewed for this annual report:

- Coal Combustion Residual Surface Impoundment History of Construction Documentation (BEPC 2016)
- Coal Combustion Residual Surface Impoundment Annual Inspection 2020 (BEPC 2021)
- Coal Combustion Residual Surface Impoundment Annual Inspection 2021 (BEPC 2022)
- Coal Combustion Residual Surface Impoundment Annual Inspection 2022 (BEPC 2023)
- Coal Combustion Residual Surface Impoundment Annual Inspection 2023 (BEPC 2024)
- CCR Construction Certification, Basin Electric Power Cooperative Laramie River Station, East Emergency Holding Pond (AECOM 2020)
- CCR Rule Report: Periodic Safety Factor Assessment, Bottom Ash Pond 1 (AECOM 2021a)
- CCR Rule Report: Periodic Structural Stability Assessment, Bottom Ash Pond 1 (AECOM 2021b)
- CCR Construction Certification, Basin Electric Power Cooperative Laramie River Station, Bottom Ash Pond 1 (AECOM 2021c)
- CCR Rule Report: Periodic Safety Factor Assessment, Bottom Ash Pond 2 (AECOM 2021d)
- CCR Rule Report: Periodic Structural Stability Assessment, Bottom Ash Pond 2 (AECOM 2021e)
- CCR Rule Report: Periodic Safety Factor Assessment, Bottom Ash Pond 3 (AECOM 2021f)
- CCR Rule Report: Periodic Structural Stability Assessment, Bottom Ash Pond 3 (AECOM 2021g)
- CCR Rule Report: Periodic Safety Factor Assessment, East Emergency Holding Pond (AECOM 2021h)
- CCR Rule Report: Periodic Structural Stability Assessment, East Emergency Holding Pond (AECOM 2021i)
- CCR Rule Report: Periodic Safety Factor Assessment, West Emergency Holding Pond (AECOM 2021j)
- CCR Rule Report: Periodic Structural Stability Assessment, West Emergency Holding Pond (AECOM 2021k)
- CCR Construction Certification, Basin Electric Power Cooperative Laramie River Station, Bottom Ash Pond 2 (AECOM 2022)
- CCR Construction Certification, Basin Electric Power Cooperative Laramie River Station, Bottom Ash Pond 3 (AECOM 2023)

2.2 Weekly Inspection Review

During 2024, qualified individuals (generally the LRS Environmental Coordinator) conducted weekly inspections for any appearance of actual or potential structural weakness and other conditions which were disrupting or had the potential to disrupt the operation or safety of the CCR unit(s). Appearances of structural weakness may include but are not limited to: (1) signs of piping and other internal erosion; (2) transverse, longitudinal, and desiccation cracking; (3) slides, bulges, boils, sloughs, scarps, sinkholes, or depressions; (4) animal burrows; (5) excessive or lacking vegetation cover; and (6) slope erosion. A review of the periodic inspection reports for the LRS CCR landfill indicated no signs of actual or potential structural weakness or other adverse conditions as described above. During the January 18, 2024, inspection, it was noted that BAP-2 was frozen due to low temperatures and low water level. The completed weekly inspection checklists are filed in the operating record. A sample weekly inspection form completed by LRS staff is provided as **Attachment B**.

3.0 On-site Annual Inspection of Facility

The annual inspection was completed by AECOM on Tuesday, December 17, 2024, starting at 7:30 a.m. Mountain Standard Time outside of the LRS administrative offices. The weather was cloudy, windy and approximately 40 degrees Fahrenheit. No snow cover was observed during the inspection visit, and visual observation and site access was not impeded.

Personnel in attendance for the inspection included:

- Emily Conkling, PE (WY #19479), AECOM
- Olivia Helinski, AECOM

A completed annual inspection form is provided as **Attachment A**. A sample weekly inspection form used by LRS staff is provided as **Attachment B**. Figures and a photo log from the December 17, 2024, inspection are included as **Attachment C**.

3.1 Findings

The findings of the annual inspection and a review of facility records are summarized in the following subsections. Depth and volume values listed in **Sections 3.1.1** and **3.1.2** were provided by LRS staff from their monitoring instrumentation (Cummings 2025).

3.1.1 BAPs

1. There have been no changes in the geometry of the BAPs since the previous annual inspection.
2. Instrumentation: All three BAPs have an AMATEK ultrasonic probe for water level measurements. The probes for BAP-1 and BAP-2 are located in the pumphouse, and the probe for BAP-3 is located at the overflow weir on the north edge of the pond.
3. Minimum depth of impounded water and CCR since the previous annual inspection:
 - a. BAP-1: 33.9 ft
 - b. BAP-2: 12.0 ft
 - c. BAP-3: 10.6 ft
4. Maximum depth of impounded water and CCR since the previous annual inspection:
 - a. BAP-1: 35.1 ft
 - b. BAP-2: 15.7 ft
 - c. BAP-3: 21.1 ft
5. Maximum recorded reading since the previous annual inspection:
 - a. BAP-1: 4,562.1 ft amsl
 - b. BAP-2: 4,554.7 ft amsl
 - c. BAP-3: 4,586.6 ft amsl
6. Depth and elevation of impounded water and CCR at the time of the 2024 annual inspection:
 - a. BAP-1: Depth of 34.7 ft with a water elevation of 4,561.7 ft amsl
 - b. BAP-2: Depth of 15.0 ft with a water elevation of 4,554 ft amsl
 - c. BAP-3: Depth of 12.5 ft with a water elevation of 4,578 ft amsl
7. Approximate volume of impounded water and CCR at the time of the 2024 annual inspection:
 - a. BAP-1: 119.7 million gallons

- b. BAP-2: 115.8 million gallons
 - c. BAP-3: 117.4 million gallons
8. Remaining estimated storage capacity at the time of the 2024 annual inspection:
 - a. BAP-1: 15.9 million gallons
 - b. BAP-2: 98.4 million gallons
 - c. BAP-3: 121.9 million gallons
9. There are no appearances of an actual or potential structural weakness of the impoundments, nor are there any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the BAPs and appurtenant structures. Connective piping between BAPs appear to be in good condition.
10. There are no other changes that may affect the stability or operation of the impounding structure since the previous annual inspection.

3.1.2 EHPs

1. There has been no change in the geometry of E-EHP since the previous inspection. W-EHP and EL-EHP have been drained and are currently undergoing excavation work associated with a liner retrofit project. Once work is complete, the final geometries of W-EHP is expected to remain similar to their respective historical geometries and remain within the respective current footprint. Any geometry changes will be noted in the 2025 annual report, once construction is completed. EL-EHP is to be removed and site regraded; progress will be summarized in the 2025 annual report.
2. An AMATEK ultrasonic probe that measures water level (located at the pump building) is present in the E-EHP. W-EHP is under construction and therefore, there are no instruments for W-EHP.
3. Minimum depth of impounded water and CCR since the previous annual inspection:
 - a. W-EHP: Not available due to dewatering efforts prior to excavation work
 - b. E-EHP: 15.0 ft
4. Maximum depth of impounded water and CCR since the previous annual inspection:
 - a. W-EHP: Not available due to dewatering efforts prior to excavation work
 - b. E-EHP: 24.6 ft
5. Maximum recorded reading since the previous annual inspection:
 - a. W-EHP: Not available due to dewatering efforts prior to excavation work
 - b. E-EHP: 4,538.6 ft amsl
6. Depth and elevation of impounded water and CCR at the time of the 2024 annual inspection:
 - a. W-EHP: Dry
 - b. E-EHP: Depth of 21.6 ft with a water elevation of 4,535.6 ft amsl
7. Approximate volume of impounded water and CCR at the time of the 2024 annual inspection:
 - a. W-EHP: Dry
 - b. E-EHP: 87.8 million gallons
8. Remaining storage capacity at the time of the 2024 annual inspection:
 - a. W-EHP: Not applicable due to ongoing excavation work
 - b. E-EHP: 18.6 million gallons

9. There are no appearances of an actual or potential structural weakness of the impoundments, nor are there any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the EHPs and appurtenant structures.
11. There are no other changes that may affect the stability or operation of the impounding structure since the previous annual inspection.

It should be noted that the elevations for the bottoms of the BAPs and E-EHP vary slightly, and the elevations cited above are approximate. Cited elevations are not to be considered as-built or uniformly applicable across the entire bottom of the ponds. Cited elevations for the toe of the units are also approximated. Additionally, for all ponds, CCR deposition at the bottom of the pond is not evenly distributed across the entire pond area such that the volume of storage (water and CCR) is approximate as well.

4.0 Conclusions

As noted in the CCR Rules §257.83(b)(5), “If a deficiency or release is identified during an inspection, the owner or operator must remedy the deficiency or release as soon as feasible and prepare documentation detailing the corrective measures taken.”

Items identified during the annual inspection and items identified during the document review that are regarded as potential deficiencies are discussed in **Section 4.2** below.

4.1 Recommendations Other Than Normal Maintenance

While no issues are significant and would impact the structural or containment integrity, based on the observations noted during the annual inspections, it is recommended that LRS staff address the minor erosion and desiccation cracking present alongside BAP-1 and BAP-2. In addition, it is recommended that the large shrub be removed from the northern capped berm of BAP-3 (**Attachment C – Photo 22**). The outfall piping into BAP-3 should be inspected by maintenance personnel to ensure the leak will remain as minor and not pose any future problems. Sediment buildup noted on the liners, debris buildup within BAP-2, animal burrows, and the areas of thinning vegetation should be monitored. The liner sticking up in the northwest corner of E-EHP should be repaired (LRS indicated that it will be monitored and is scheduled for repair in summer 2025) (**Attachment C – Photo 33**).

4.2 Deficiencies Discovered

The following paragraph details the observations noted for the BAPs during the annual inspection:

While no issues are significant and would impact the structural or containment integrity, Minor erosion, including divots and rills, was noted alongside the northern and eastern sides of BAP-1 (**Attachment C – Photo 1** and **Photo 4**), in addition to the southern and eastern sides of BAP-2 (**Attachment C – Photo 20**, **Photo 23**, and **Photo 25**). Overall, vegetation cover was good and well-distributed along the berms of the BAPs. However, it was observed that vegetation is slightly thinning and there is a large shrub (yucca plant) growing along the northern capped cell of BAP-3 (**Attachment C – Photo 11** and **Photo 22**). The shrub is planned for removed in 2025. The liners of the BAPs all appeared to be in good condition and no damage was observed. Minor sediment buildup on the liners along the southern sides of BAP-1, BAP-2, and BAP-3 was noted (**Attachment C – Photo 12**, **Photo 19**, and **Photo 28**). Additionally, small, not fully formed folds were observed in the pond liner alongside the northern side of BAP-1 (**Attachment C – Photo 2**) and should be monitored. It was also observed that the surface outfall piping into BAP-3 appeared to have a small leak that was contained within the lined pond footprint but should be monitored for changes (**Attachment C – Photo 26**). The area of the landfill where the material from the W-EHP is being placed (**Attachment C – Photo 16**) appears to be blowing into BAP-2 and may be responsible for the debris buildup noted within the pond (**Attachment C – Photo 13**). No releases were identified during inspection.

The following paragraph details the observations noted for the EHPs during the annual inspection:

Overall, the vegetation cover looked good and well-distributed along the berms surrounding the EHPs. However, thinned vegetation was observed along the southern berm of W-EHP, the top of the northern berm of E-EHP, and the eastern berm of EL-EHP (**Attachment C – Photo 43**, **Photo 45**, and **Photo 47**). It was noted that there was minor sediment buildup along the northern liner of E-EHP (**Attachment C – Photo 28**) and a piece of liner sticking up from the ground in the northwest corner of the pond is far above the high-water mark and is scheduled for repair (**Attachment C – Photo 33**). Two small animal burrows were observed along the northern berm of EL-EHP (**Attachment C – Photo 46**) but as this berm will be removed, this is not critical. Sediment removal work in W-EHP and EL-EHP was observed during the annual inspection and is expected to continue into Spring 2025; as such, pond

geometries may change during 2025 and should be recalculated for the 2025 annual report. No releases were identified during inspection.

4.3 Corrective Measures Taken

In the Coal Combustion Residual Surface Impoundment Annual Inspection 2023 (BEPC 2024) report, the erosion rills in the eastern slope of the capped portion of BAP-3 were noted. LRS was aware of the rills prior to the report and corrective measures were in place. The reseeding was completed in February 2024. No other corrective measures actions took place in 2024.

5.0 References

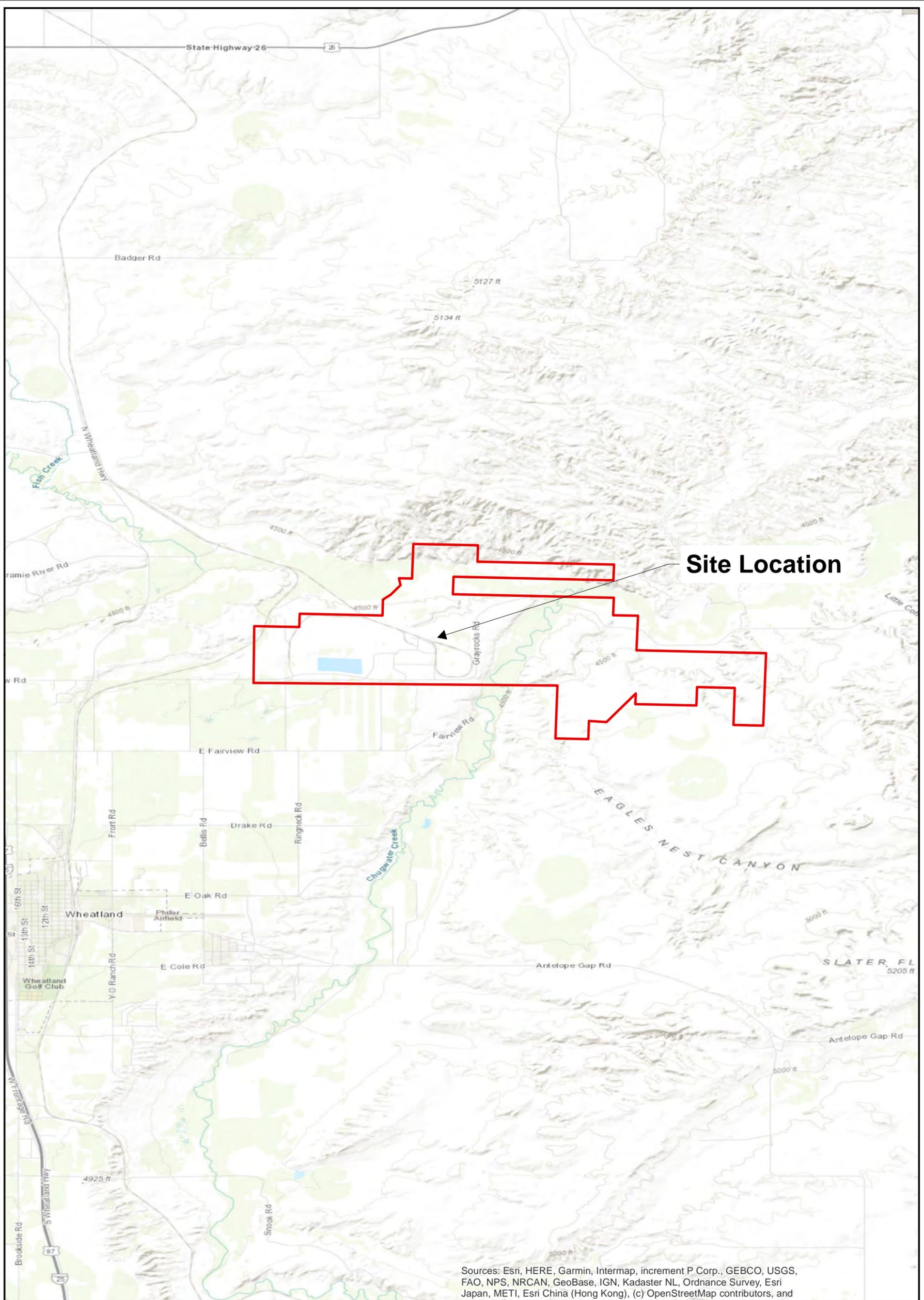
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- AECOM. 2021b. CCR Rule Report: Periodic Structural Stability Assessment, Bottom Ash Pond 1, Laramie River Station. October 12.
- AECOM. 2021c. CCR Construction Certification, Basin Electric Power Cooperative Laramie River Station, Bottom Ash Pond 1. March 18.
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- AECOM. 2021g. CCR Rule Report: Periodic Structural Stability Assessment, Bottom Ash Pond 3, Laramie River Station. October 12.
- AECOM. 2021h. CCR Rule Report: Periodic Safety Factor Assessment, East Emergency Holding Pond, Laramie River Station. October 12.
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BEPC. 2024. Coal Combustion Residual Surface Impoundment Annual Inspection Report – 2023, Basin Electric Power Cooperative, Laramie River Station. January 17.

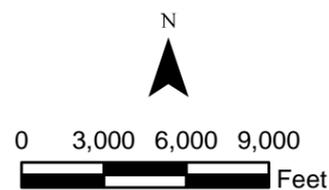
Cummings, D. 2025. Personal Communication. January 14.

Figure

Path: C:\Users\jilliana.ignat\AECOM\GIS Services - GIS CAD PROJECTS\DCS AMERICAS\REMWEST\F343\Basin Electric Power Cooperative\2024 CCR Inspection Reports\20250109\Workspace\Figure 1 Site Location Map.mxd



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and



**Attachment A
Federal CCR Annual
Inspection Form**

Federal CCR Annual Inspection Form - Surface Impoundment

Rev. 0

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Station: Laramie River Station

CCR Unit: E-EHP / EL-EHP

Date: 12/17/2024

Inspector(s): O.Helinski / E.Conkling

Weather Conditions: cloudy, windy, 40s

Ground Conditions: dry, not muddy, no snow

Purpose of Inspection: Per the CCR Rule published by the USEPA and entered into the federal register on October 19, 2015, existing and new CCR units are required to be inspected annually by a qualified professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is in good condition and conforms to standard engineering practices for this type of facility.

Please refer to the attached figure to mark location of any identified conditions.

General Information:

Name of Owner/Operator: Basin Electric Power Cooperative

Address of Owner/Operator: 347 Grayrocks Rd, Wheatland, WY 82201

State ID number of CCR unit (if available): _____

Name and size (acres) of the watershed within which the CCR unit is located: Laramie River

Records Review:

- 1) Have periodic inspections been conducted by a qualified person?
- 2) Have the periodic inspections been recorded in the facility's operating record?
- 3) Have any indications of structural instability been observed in the periodic inspections since the last annual inspection:
 - 3a) signs of piping or other internal erosion
 - 3b) transverse, longitudinal, or desiccation cracking
 - 3c) slides, bulges, boils, sloughs, scarps, sinkholes, or depressions
 - 3d) animal burrows
 - 3e) excessive or lacking vegetative cover
 - 3f) slope erosion

Yes	No	NA
X		
X		
	X	
	X	
	X	
	X	
	X	
	X	
	X	

Location ID # or map identifier

Annual Inspection:

- 1) Have there been any changes to the impoundment geometry since the last annual inspection?
 - 1a) any material removed?
 - 1b) any berms removed?
 - 1c) any berms constructed?
 - 1d) any berms modified?
 - 1e) any cap/cover system installed?
 - 1f) any other retrofits?

X		
X		
	X	
	X	
	X	
	X	
X		

EL-EHP sludge/sediment being removed and placed in on-site landfill

EL-EHP sludge/sediment being removed and placed in on-site landfill

Federal CCR Annual Inspection Form - Surface Impoundment

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Station: Laramie River Station

CCR Unit: E-EHP / EL-EHP

Date: 12/17/2024

2) Are there any instruments associated with the impoundment?

X		
X		

2a) Are the instruments in good condition?

2b) Location:

2c) Type:

2d) Purpose:

Pumphouse

AMATEK ultrasonic probe

water level measurement

3) Are there any appearances of actual or potential structural weakness?

	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	
	X	

3a) signs of piping or other internal erosion

3b) transverse, longitudinal, or desiccation cracking

3c) slides, bulges, boils, sloughs, scarps, sinkholes, or depressions

3d) animal burrows

3e) excessive or lacking vegetative cover

3f) slope erosion

4) Are there any other conditions which are disrupting or have the potential to disrupt the operation and safety of the CCR unit?

5) Are there any signs of distress or malfunction of the CCR unit and appurtenant structures?

6) Are there any conditions of the hydraulic structures that could disrupt the structural integrity or continued safe operation?

Measurements:

Maximum recorded readings of each instrument since previous annual inspection: 103.801 million gallons

Minimum depth and elevation of impounded water and CCR since previous annual inspection: 15.0 ft deep and 4,529 ft amsl

Maximum depth and elevation of impounded water and CCR since previous annual inspection: 24.6 ft deep and 4,538.6 ft amsl

Depth and elevation of impounded water and CCR at time of inspection: 21.6 ft deep and 4,535.6 ft amsl

Storage capacity of impounding structure at time of inspection: 18.6 million gallons

Approximate volume of impounded water and CCR at time of inspection: 87.8 million gallons

Surface Area (acres): 27.9 acres

Elevation of impoundment dike crest: 4,540.5 ft amsl

Elevation of impoundment dike toe: 4,520.5 ft amsl

Federal CCR Annual Inspection Form - Surface Impoundment

Rev. 0

Page 3 of 3

Station: Laramie River Station

CCR Unit: E-EHP / EL-EHP

Date: 12/17/2024

Additional Comments: Major construction efforts ongoing in EL-EHP at time of inspection: pond has been taken out of service. No water in pond, and settled sludge/sediment is being removed and hauled to the onsite landfill

Individual Completing Form: Emily Conkling
Print


Signature

**Attachment B
Sample LRS Weekly
Inspection Form**

**Basin Electric Power Cooperative –Laramie River Station (LRS)
 CCR Surface Impoundment and CCR Landfill
 Periodic Inspection Checklist**

Inspector: David Cummins Date: 12/17/24

Surface Impoundment Standards: At intervals not exceeding seven days, inspect the surface impoundment for any appearances of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the CCR surface impoundment unit.

Yes	No	N/A	
	✓		1. Does vegetation growth exceed 6" in height on surface impoundment dikes?
	✓		2. Is there excessive, turbid, or sediment-laden seepage present?
	✓		3. Are there signs of piping and other internal erosion?
	✓		4. Is transverse, longitudinal, and severe desiccation cracking present?
	✓		5. Are slides, bulges, boils, sloughs, scarps, sinkholes, or depressions present?
	✓		6. Are there abnormally high or low pool levels?
	✓		7. Are there animal burrows?
	✓		8. Are there areas with excessive or lacking vegetative cover?
	✓		9. Is any slope erosion present?
	✓		10. Is any unusual debris present in the impoundment?

Actions taken to correct deficiencies (any question answered "Yes") or other comments:

Surface Impoundment Hydraulic Structure Standards: At intervals not exceeding seven days, inspect the discharge of all outlets of hydraulic structures which pass underneath the base of the CCR surface impoundment or through the dike of the CCR surface impoundment. Facilities may have more than one outlet requiring periodic inspection.

Yes	No	N/A	
	✓		1. Is there any abnormal discoloration at discharge outlets?
	✓		2. Is there any flow or discharge of debris or sediment?

Actions taken to correct deficiencies (any question answered "Yes") or other comments :

Landfill Standards: At intervals not exceeding seven days, inspect for any appearances of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the CCR unit.

Yes	No	N/A	
	✓		1. Are there signs of piping and other internal erosion?
	✓		2. Is transverse, longitudinal, and severe desiccation cracking present?
	✓		3. Are slides, bulges, boils, sloughs, scarps, sinkholes, or depressions present?
	✓		4. Are there animal burrows?
	✓		5. Is any slope erosion present?

Actions taken to correct deficiencies (any question answered "Yes") or other comments:

CCR Fugitive Dust Standards: At intervals not exceeding seven days, inspect for CCR fugitive dust originating from CCR units, roads, and other CCR material management and material handling activities.

Yes	No	N/A	
	✓		1. Is there any CCR dust observed at landfill(s)?
	✓		2. Is there any CCR dust observed at surface impoundments(s)?
	✓		3. Is there any CCR dust observed during ash loading or unloading activities?
	✓		4. Is there any CCR dust observed during ash transport or other handling??

Actions taken to correct deficiencies (any question answered "Yes") or other comments:

Surface Impoundment Instrumentation Standards: At intervals not exceeding 30 days, inspect all CCR surface impoundment unit instrumentation.

Yes	No	N/A	
✓			1. Is XXX instrumentation in good working order and functioning as designed?
✓			2. Is XXX instrumentation in good working order and functioning as designed?

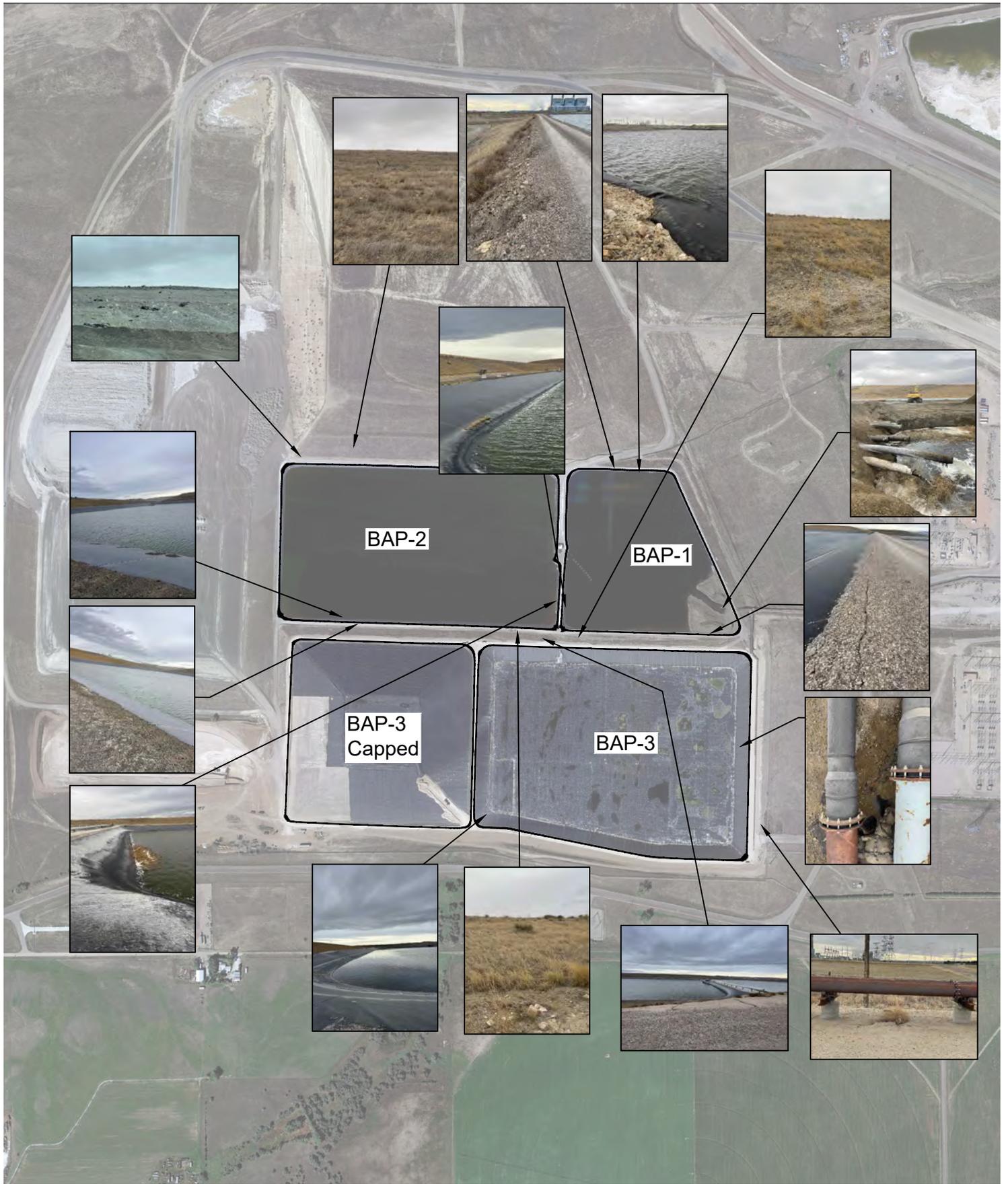
Actions taken to correct deficiencies (any question answered "No") or other comments:

Signature of Qualified Person:

Title:

**Attachment C
Photo Log of Annual
Inspection**

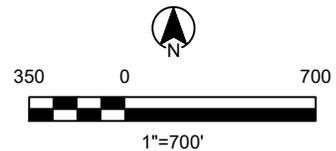
File: C:\Users\jliana\matia\AECOM\GIS Services - GIS CAD PROJECTS\DCS AMERICAS\BREMWEST\349\Basin Electric Power Cooperative\2024_CCR_Inspection_Reports\20250113\Workspace\CAD\HPSPhotoMap_AA.dwg Layout: Ash Dec 2024 Date: 13 Jan, 2025 Xref:s



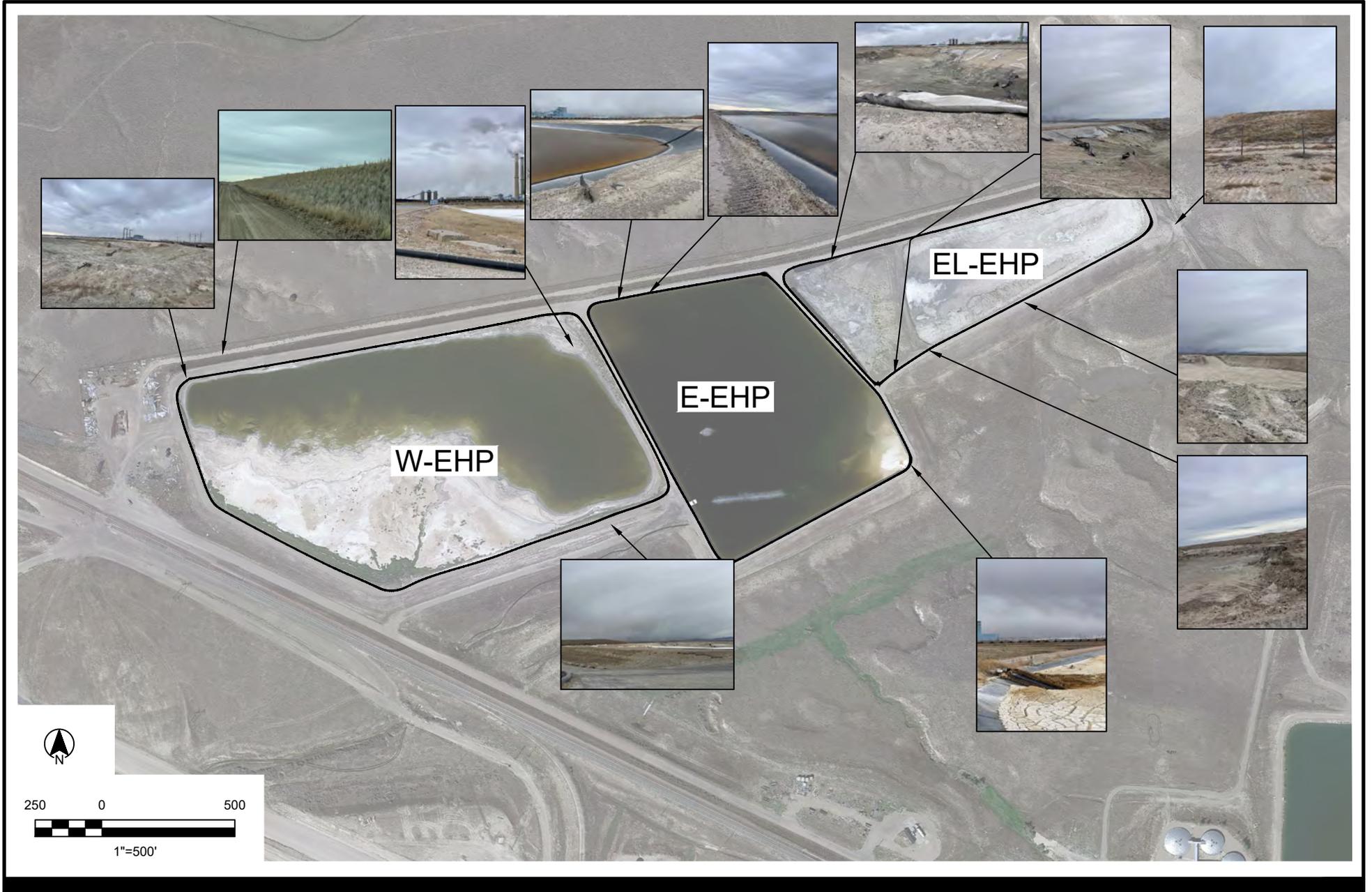
Aerial Source: Google Earth Pro

Basin Electric Power Cooperative
Bottom Ash Ponds
Wheatland, Wyoming
Project No.: 60732883 Date: 01/13/2025

Bottom
Ash
Ponds
Photo Map
December 17, 2024



AECOM
Attachment C



PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 1	Date: 12/17/24		
Direction Photo Taken: East			
Description: <u>Location:</u> northern side of Bottom Ash Pond (BAP)-1 Erosion rills are present along the northern side of the road.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 2	Date: 12/17/24		
Direction Photo Taken: Southeast			
Description: <u>Location:</u> Northern side of BAP-1 Folds in pond liner that are not fully formed.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 3	Date: 12/17/24		
Direction Photo Taken: Southeast			
Description: <u>Location:</u> Northeast corner of BAP-1 Eastern side of BAP-1.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 4	Date: 12/17/24		
Direction Photo Taken: Southeast			
Description: <u>Location:</u> Northeast corner of BAP-1 Vegetation along the eastern berm of BAP-1.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 5	Date: 12/17/24		
Direction Photo Taken: Southeast			
Description: <u>Location:</u> Southeast corner of BAP-1. CCR sediment build-up from outfall within the southeast corner of BAP-1.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 6	Date: 12/17/24		
Direction Photo Taken: Southeast			
Description: <u>Location:</u> Southeast corner of BAP-1 Water inlets of BAP-1.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY		Project No. 60732883
Photo No. 7	Date: 12/17/24			
Direction Photo Taken: West				
Description: <u>Location:</u> Southern side of BAP-1 Minor desiccation cracking in the roadway along southern side of BAP-1.				

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY		Project No. 60732883
Photo No. 8	Date: 12/17/24			
Direction Photo Taken: South				
Description: <u>Location:</u> Northern side of BAP-3. Vegetation along capped berm of BAP-3.				

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 9	Date: 12/17/24		
Direction Photo Taken: Northeast			
Description: <u>Location:</u> Southern side of BAP-1 Vegetation along southern side of BAP-1.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 10	Date: 12/17/24		
Direction Photo Taken: Northeast			
Description: <u>Location:</u> Southwest corner of BAP-1 Outfall into BAP-1.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 11	Date: 12/17/24		
Direction Photo Taken: South			
Description: <u>Location:</u> Southwest corner of BAP-1. Slightly thinning vegetation along capped berm of BAP-3.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 12	Date: 12/17/24		
Direction Photo Taken: North			
Description: <u>Location:</u> Southeast corner of BAP-2 Slight sediment buildup on liner of BAP-2.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 13	Date: 12/17/24		
Direction Photo Taken: South			
Description: <u>Location:</u> Eastern side of BAP-2. Tumbleweed buildup in BAP-2.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 14	Date: 12/17/24		
Direction Photo Taken: North			
Description: <u>Location:</u> Northwest corner of BAP-1 Water level of northwest corner of BAP-1.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 15	Date: 12/17/24		
Direction Photo Taken: West			
Description: <u>Location:</u> Northeast corner of BAP-2. Outfall into BAP-2.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 16	Date: 12/17/24		
Direction Photo Taken: West			
Description: <u>Location:</u> Eastern side of BAP-2. Liner debris blown in from active working face of landfill. Debris not from BAP-2 liner system.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 17	Date: 12/17/24		
Direction Photo Taken: Northeast			
Description: <u>Location:</u> Northwest corner of BAP-2. Animal runway placed on the northwest corner of BAP-2.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 18	Date: 12/17/24		
Direction Photo Taken: Northeast			
Description: <u>Location:</u> Southwest corner of BAP-2. Outfall into BAP-2.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 19	Date: 12/17/24		
Direction Photo Taken: Northwest			
Description: <u>Location:</u> Southern side of BAP-2. Minor sediment buildup on liner.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 20	Date: 12/17/24		
Direction Photo Taken: Northwest			
Description: <u>Location:</u> Southern side of BAP-2. Minor erosion divots along roadside. Roadway recently raised in elevation.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 21	Date: 12/17/24		
Direction Photo Taken: Northwest			
Description: <u>Location:</u> Southern side of BAP-2. Floating evaporator stationed along the southern side of BAP-2.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 22	Date: 12/17/24		
Direction Photo Taken: South			
Description: <u>Location:</u> Southern side of BAP-2. Large vegetation growing along the northern berm of BAP-3.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 23	Date: 12/17/24		
Direction Photo Taken: North			
Description: <u>Location:</u> Southwest corner of BAP-2 Erosion rills on berm north of BAP-3 and south of BAP-2.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 24	Date: 12/17/24		
Direction Photo Taken: South			
Description: <u>Location:</u> Southeast corner of BAP-2 Outfall into BAP-2.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY		Project No. 60732883
Photo No. 25	Date: 12/17/24			
Direction Photo Taken: East				
Description: <u>Location:</u> Eastern side of BAP-3. Erosion rills under piping.				

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY		Project No. 60732883
Photo No. 26	Date: 12/17/24			
Direction Photo Taken: Birdseye view				
Description: <u>Location:</u> Eastern side of BAP-3. Minor leak in outfall piping into BAP-3. Leak is contained within lined footprint of BAP-3.				

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 27	Date: 12/17/24		
Direction Photo Taken: South			
Description: <u>Location:</u> Southeast corner of BAP-3. Outfall area of BAP-3.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 28	Date: 12/17/24		
Direction Photo Taken: North			
Description: <u>Location:</u> Southwest corner of BAP-3. Sediment buildup on liner.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No.: 60732883
Photo No. 29	Date: 12/17/24		
Direction Photo Taken: East			
Description: <u>Location:</u> Western side of BAP-3. Vegetation cover.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No.: 60732883
Photo No. 30	Date: 12/17/24		
Direction Photo Taken: Southwest			
Description: <u>Location:</u> Northwest corner of West-Emergency Holding Pond (W-EHP). CCR sediment material removal is taking place within W-EHP.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 31	Date: 12/17/24		
Direction Photo Taken: North			
Description: <u>Location:</u> Northern berm of W-EHP. Strong vegetation cover.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 32	Date: 12/17/24		
Direction Photo Taken: Southwest			
Description: <u>Location:</u> Eastern side of W-EHP. Strong vegetation cover.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 33	Date: 12/17/24		
Direction Photo Taken: West			
Description: <u>Location:</u> Northwest corner of East-Emergency Holding Pond (E-EHP) Outfall into E-EHP and limited liner damage above high water line in impoundment.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 34	Date: 12/17/24		
Direction Photo Taken: Northeast			
Description: <u>Location:</u> Northern side of E-EHP. Slight sediment buildup on liner.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 35	Date: 12/17/24		
Direction Photo Taken: Northwest			
Description: <u>Location:</u> Southeast corner of E-EHP. Sediment within outfall area of E-EHP.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 36	Date: 12/17/24		
Direction Photo Taken: Southwest			
Description: <u>Location:</u> Southwest corner of E-EHP. Outfall into E-EHP.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 37	Date: 12/17/24		
Direction Photo Taken: Northwest			
Description: <u>Location:</u> Southeast corner of E-EHP. Channel formed by outfall into E-EHP.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 38	Date: 12/17/24		
Direction Photo Taken: West			
Description: <u>Location:</u> Eastern side of W-EHP. CCR material being moved from W-EHP to the landfill.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 39	Date: 12/17/24		
Direction Photo Taken: Southeast			
Description: <u>Location:</u> Northwest corner of eastern lobe of E-EHP (EL-EHP). Liner being removed as part of excavation efforts.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 40	Date: 12/17/24		
Direction Photo Taken: Southeast			
Description: <u>Location:</u> Northern side of EL-EHP. Liner being removed as part of excavation efforts.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 41	Date: 12/17/24		
Direction Photo Taken: Northwest			
Description: <u>Location:</u> Southern side of EL-EHP. Current state of EL-EHP.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 42	Date: 12/17/24		
Direction Photo Taken: North			
Description: <u>Location:</u> Southern side of EL-EHP. Sediment wall within EL-EHP.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 43	Date: 12/17/24		
Direction Photo Taken: East			
Description: <u>Location:</u> Southern berm of W-EHP. Vegetation along southern berm.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 44	Date: 12/17/24		
Direction Photo Taken: East			
Description: <u>Location:</u> Northern berm of W-EHP. Strong vegetation cover.			

PHOTOGRAPHIC LOG

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 45	Date: 12/17/24		
Direction Photo Taken: Southwest			
Description: <u>Location:</u> Northern berm of E-EHP. Slightly thinning vegetation towards top of berm.			

Client Name: Basin Electric Power Cooperative		Site Location: Laramie River Station, Wheatland, WY	Project No. 60732883
Photo No. 46	Date: 12/17/24		
Direction Photo Taken: Southwest			
Description: <u>Location:</u> Northern berm of EL-EHP. Small animal burrow.			

PHOTOGRAPHIC LOG

Client Name:
Basin Electric Power Cooperative

Site Location:
Laramie River Station, Wheatland, WY

Project No.
60732883

Photo No.
47

Date:
12/17/24

Direction Photo Taken:

West

Description:

Location: Eastern berm of EL-EHP.

Thinned vegetation. Berm is scheduled to be removed during future regrading project.

