

October 12, 2026

Mr. Mark Dihle
Basin Electric Power Cooperative
1717 East Interstate Avenue
Bismarck, North Dakota 58503

Re: 2026 Hazard Potential Classification Update for CCR Surface Impoundments
Laramie River Station
Platte County, Wyoming

Dear Mr. Dihle:

AECOM has been retained by Basin Electric Power Cooperative (Basin Electric) to prepare the following assessment of the EPA's requirements under the HAZARDOUS AND SOLID WASTE MANAGEMENT SYSTEM; DISPOSAL OF COAL COMBUSTION RESIDUALS FROM ELECTRIC UTILITIES (EPA Final CCR Rule § 257.73) associated with the Hazard Potential Classification Requirements for CCR Surface Impoundments. Presented below are the project background, summary of findings, limitations, and certification.

1. Background

As required by § 257.73 (a)(2) of the EPA Final CCR Rule, by October 17, 2016, documentation was required to establish an initial hazard potential classification including how the classification was determined. This letter serves as the second 5-year recertification to the original hazard classification established in 2016.

The Laramie River Station is a coal-fired plant located approximately five miles northeast of Wheatland, Wyoming. The station consists of three units, which produce up to approximately 1,710 megawatts of power. The Laramie River Station currently operates two ash impoundment complexes: the Bottom Ash Ponds (which is comprised of three cells) and the Emergency Holding Ponds (which is comprised of two cells). Within the context of this letter, the individual cells will be referred to as Bottom Ash Pond 1, Bottom Ash Pond 2, Bottom Ash Pond 3, East Emergency Holding Pond, and West Emergency Holding Pond.

The EPA has developed a hazard potential classification system that refers to the possible adverse incremental consequences that result from the release of water or stored contents due to failure of the diked CCR surface impoundment or mis-operation of the diked CCR surface impoundment for its appurtenances. These ratings do not refer to the condition of structural stability of the dikes. There are three hazard potential classifications in the CCR Rule used in assessing ash impoundments. These classifications are as follows:

High Hazard Potential: Diked surface impoundments assigned the high hazard potential classification are those where failure or mis-operation will probably cause loss of human life.

Significant Hazard Potential: Diked surface impoundments assigned the significant hazard potential classification are those where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

Low Hazard Potential: Diked surface impoundments assigned the low hazard potential classification are those where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner's property.

2. Summary of Findings

The Hazard Potential Classification has been determined to be as follows based on the requirements for EPA Final CCR Rule §257.73 (a)(2).

Bottom Ash Pond 1: Significant
Bottom Ash Pond 2: Significant
Bottom Ash Pond 3: Significant
East Emergency Holding Pond: Significant
West Emergency Holding Pond: Significant

There is no change to the classifications. Details of the classification of each impoundment are summarized below:

Bottom Ash Pond 1

An uncontrolled release from Bottom Ash Pond 1 due to a failure or mis-operation is not expected to result in loss of human life. However, an uncontrolled release will likely result in environmental impacts as CCR-impacted water will flow beyond the owner's property and across agricultural land and potentially reach the Laramie River. Due to the potential environmental impacts to the agricultural land and the Laramie River, AECOM recommends Bottom Ash Pond 1 be assigned a "significant" hazard potential classification.

Bottom Ash Pond 2

An uncontrolled release from Bottom Ash Pond 2 due to a failure or mis-operation is not expected to result in loss of human life. However, an uncontrolled release will likely result in environmental impacts as CCR-impacted water will flow beyond the owner's property and across agricultural land and potentially reach the Laramie River. Due to the potential environmental impacts to the agricultural land and the Laramie River, AECOM recommends Bottom Ash Pond 2 be assigned a "significant" hazard potential classification.

Bottom Ash Pond 3

An uncontrolled release from Bottom Ash Pond 3 due to a failure or mis-operation is not expected to result in loss of human life. However, an uncontrolled release will likely result in environmental impacts as CCR-impacted water will flow beyond the owner's property and across agricultural land and potentially reach the Laramie River. An uncontrolled release could also overtop the adjacent county road and disrupt lifeline facilities. Due to the potential environmental impacts to the agricultural land and the Laramie River as well as the potential disruption of lifeline facilities, AECOM recommends Bottom Ash Pond 3 be assigned a "significant" hazard potential classification.

East Emergency Holding Pond

An uncontrolled release from the East Emergency Holding Pond due to a failure or mis-operation is not expected to result in loss of human life. However, an uncontrolled release will likely result in environmental impacts as CCR-impacted water will flow beyond the owner's property and across agricultural land and likely reach the Laramie River. Due to the potential environmental impacts to the agricultural land and the Laramie River, AECOM recommends the East Emergency Holding Pond be assigned a "significant" hazard potential classification.

West Emergency Holding Pond

An uncontrolled release from the West Emergency Holding Pond due to a failure or mis-operation is not expected to result in loss of human life. However, an uncontrolled release will likely result in environmental impacts as CCR-impacted water will flow beyond the owner's property and across agricultural land and likely reach the Laramie River. Due to the potential environmental impacts to the

agricultural land and the Laramie River, AECOM recommends the West Emergency Holding Pond be assigned a "significant" hazard potential classification.

3. Limitations

The signature of AECOM's authorized representative on this document represents that to the best of AECOM's knowledge, information and belief in the exercise of its professional judgment, it is AECOM's professional opinion that the aforementioned information is accurate as of the date of such signature. Any recommendation, opinion, or decisions by AECOM are made on the basis of AECOM's experience, qualifications and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care. Hazard Potential Classification certification does not warrant or guarantee performance, and it is then the responsibility of the owner to ensure the facility is being maintained and operated properly.

4. Certification

I, Aaron Humphrey, being a registered Professional Engineer in accordance with the State of Wyoming Professional Engineer's registration do hereby certify to the best of my knowledge, information, and belief, that the information contained in this report is true and correct and has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Units, that the information contained in this letter dated October 12, 2026 was conducted in accordance with the requirements of 40 CFR § 257.73.

SIGNATURE:  DATE: October 12, 2026

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