

**PUBLIC UTILITIES COMMISSION OF NEVADA
MEMORANDUM**

DATE: October 1, 2026

TO: The Commission
Via: Anne-Marie Preisach, DRO

FROM: Ryan Sinclair, P.E., Regulatory Engineer, Engineering Division

SUBJECT: Agenda No 19-26; Item No. 6A; Docket No. 20-11007;
Application of Noble Solar LLC, under the provisions of the Utility Environmental Protection Act, for a permit to construct the Purple Sage Energy Center Project consisting of an up to 400 MW photovoltaic solar electric generating facility, a 400 MW battery energy storage system, a 230 kV substation and generation-tie line to interconnect with the Trout Canyon Substation, and associated facilities to be located on approximately 4,462 acres of federally-managed land in Clark County, Nevada.

I. Summary of Application

Pursuant to the provisions of the Utility Environmental Protection Act (“UEPA”) and Nevada Revised Statutes (“NRS”) 704.820 through NRS 704.900, on July 10, 2026, Noble Solar LLC (“Noble Solar”) filed with the Public Utilities Commission of Nevada (“Commission”) an Application for a Permit to Construct the Purple Sage Energy Center Project consisting of an up to 400 megawatt “MW”) photovoltaic (“PV”) solar electric generating facility, a 400 MW battery energy storage system (“BESS”), a 230 kilovolt (“kV”) substation and generation-tie line to interconnect with the Trout Canyon Substation, and associated facilities to be located on approximately 4,462 acres of federally-managed land in Clark County, Nevada (the “Project”).¹

Noble Solar requests that the Commission grant the request for a UEPA permit, in four separate phases, authorizing it to commence construction of the Project as outlined above. The Project will consist of a 400 MW solar PV power generating facility, a 230 kV substation and generation tie (“gen-tie”) line into the Trout Canyon Substation, a 400 MW BESS, linear facilities (e.g., driveway, internal access roads, and communication facilities); and operation and maintenance (“O&M”) facilities and additional ancillary facilities typically associated with solar PV facilities. A legal description of the proposed location for the Project is provided in Exhibit A attached hereto. As required by NRS 704.870(1) and Nevada Administrative Code 703.423, the Application contains an Environmental Impact Statement (“EIS”) prepared by Bureau of Land Management (“BLM”).

¹ The Project itself does meet the “Utility facility” definition pursuant to NRS 704.860 because the Electric Generating Plant has a nameplate capacity above 70 MW.

The Regulatory Operations Staff of the Commission (“Staff”) has completed its investigation and recommends that the Commission grant the Application and issue an order authorizing the construction of the Project as outlined herein.

II. Analysis and Investigation

Facilities, Water Use and Employment

The Project will be located within a right-of-way of approximately 4,462 acres of federal land administered by the BLM. The Project site is located in Clark County, immediately adjacent to the Nye County line, in the Pahrump Valley, approximately 26 miles west of the City of Las Vegas, Nevada. The Project will connect to the electric grid at the Trout Canyon Substation which is located southeast of the Project site.

Noble Solar stated approximately 28 acre-feet of water. The water will be sourced from an existing water rights holder in the commercial business of selling water or a user with an existing appropriation.

Noble Solar stated the project would create up to 600 positions in direct construction jobs and 8-10 long-term jobs during operations.

The Application contains supporting documentation for the Project, including:

Exhibit A	Site Location Map
Exhibit B	Regional Map
Exhibit C	Legal Description of Proposed Facility
Exhibit D	Scaled Diagrams
Exhibit E	Facility Plan
Exhibit F	Environmental Impact Statement
Exhibit G	Proof of Publication
Exhibit H	Proof of Service to County Clerk, Nevada State Clearinghouse and Other Agencies
Exhibit I	NDOW Energy Planning and Conservation Fund Application for Energy Projects
Exhibit J	Draft Notice

Staff’s investigation and analysis of the Application reflects the UEPA statutes and, in particular, the pertinent provisions of NRS 704.890(1) and (2),² which require the Commission to make

² NRS 704.890 (1) and (2) provide:

“(1) . . . [T]he Commission may not grant a permit for the construction, operation and maintenance of a utility facility, either as proposed or as modified by the Commission, to a person unless it finds and determines:

- (a) The nature of the probable effect on the environment;
- (b) If the utility facility emits greenhouse gases and does not use renewable energy as its primary source of energy to generate electricity, the extent to which the facility is needed to ensure reliable utility service to customers in this State;
- (c) That the need for the facility balances any adverse effect on the environment;
- (d) That the facility represents the minimum adverse effect on the environment, considering the state of

certain findings and determinations regarding the environmental effect, need, other required permits, and whether the Project is in the public interest. Each of those statutorily required findings are addressed below.

NRS 704.890(1)(a) (Environmental Effects): The Application contains an EIS that was prepared by the BLM. The EIS evaluates the resources potentially impacted by the Project including air quality, wildlife, migratory birds, and other special status wildlife, threatened and endangered wildlife species, meteorological trends, cultural resources, land use and realty, Native American concerns, National Historic Trails, paleontology, public health and safety, recreation, socioeconomics, soils, transportation and traffic, vegetation, special status plants, and noxious weeds, visual resources and water resources, and provides a comprehensive summary of these environmental impacts. The EIS states that the Project has the potential to impact various environmental resources but concludes that these impacts will be reduced by obtaining all required permits and implementing mitigation measures disclosed throughout the EIS and/or associated with the permits required for the project.

NRS 704.890(1)(b) (Greenhouse Gas Emissions/Effect on Reliability of Service): The Commission is not required to find and determine the extent to which the Project is needed to ensure reliable service to customers in Nevada because the Project does not emit greenhouse gases. The Project uses renewable energy as its primary source of energy to generate electricity, and therefore exempt from the requirements of NRS 704.890(1)(B). The Project as proposed will connect into the California Independent System Operator transmission system and provide additional capacity and energy into the western electrical interconnect.

NRS 704.890(1)(c) (Balancing Need and Environmental Effect): The need for the Project balances any adverse effects on the environment. Noble Solar states the mitigation measures either avoid, reduce, or minimize potential environmental impacts. The Project will be designed, constructed, and operated to meet all applicable regulatory requirements and to avoid, minimize and mitigate the adverse effect on the environment. In addition, the Project will also result in long-term improved air quality by displacement of electricity produced from fossil fuels, resulting in an improvement to human health.

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- available technology and the nature and economics of the various alternatives;
- (e) That the location of the facility as proposed conforms to applicable state and local laws and regulations issued thereunder and the applicant has obtained, or is in the process of obtaining, all other permits, licenses, registrations and approvals required by federal, state, and local statutes, regulations and ordinances;
 - (f) That the surplus asset retirement plan filed pursuant to NRS 704.870:
 - (1) Complies with federal, state and local laws;
 - (2) Provides for the remediation and reuse of the facility within a reasonable period; and
 - (3) Is able to be reasonably completed under the funding plan contained in the application; and
 - (g) That the facility will serve the public interest.
- (2) If the Commission determines that the location of all or a part of the proposed facility should be modified, it may condition its permit upon such a modification. If the applicant has not obtained all the other permits, licenses, registrations and approvals required by federal, state and local statutes, regulations and ordinances as of the date on which the Commission decides to issue a permit, the Commission shall condition its permit upon the applicant obtaining those permits and approvals.”

NRS 704.890(1)(d) (Minimum Adverse Effect-Mitigation): The EIS determined that potential impacts will be reduced with the use of best management practices and mitigation measures. Examples of the mitigation measures described in the EIS include:

- **3.4.5 Threatened and Endangered Wildlife Species Mitigation Measures:** MM WILD-1: requires that the disturbance be reduced to the minimum size needed, and the Project has been designed to reduce potential impacts to Mojave desert tortoise from construction through the implementation of Solar PEIS design features and other plans. To reduce impacts associated with translocation, the Desert Tortoise Translocation Plan for the Stump Springs Regional Augmentation Site would address the outstanding data needs for translocation of desert tortoises outside of the area contained within the exclusion fencing and describe the USFWS-approved procedures and protocols for relocation and monitoring, including adaptive management to address issues resulting in high levels of mortality. In addition, the Stump Springs Desert Tortoise Long Term Monitoring Plan shall include a 30-year study to monitor the long-term impacts of translocation on desert tortoises to the Stump Springs Regional Augmentation Site. The BLM submitted the Biological Assessment and engaged in formal consultation with USFWS under Section 7 of the ESA, during which impacts were assessed. Additional minimization measures are identified in the Biological Opinion signed by USFWS on April 29, 2025, to minimize impacts to the Mojave desert tortoise (refer to the Biological Opinion); however, a significant loss of habitat and a potential for substantial loss of desert tortoises would still occur, resulting in adverse effects. Data from the overall success of translocation and survivability post translocation would be analyzed based upon the seasonality of translocations occurring in the spring and those occurring in the fall. This data may serve to increase the total success and survivability for desert tortoise in future translocation efforts.
- **3.6.5 Resources Mitigation Measures:** MM CR-1: Cultural Resource Management Plan: requires establishment of an Environmental Exclusion Area (EEA) encompassing the known National Register of Historic Places -eligible resource (Site 26CK11312) and a 50-foot buffer that would be avoided by Project construction. Archaeological monitoring would be required for all construction activities within 100 feet of the EEA. Solar PEIS CR1-1 requires construction personnel to be trained to avoid EEAs. The training would include the consequences of disturbing cultural resources. These measures would be intended to avoid adverse effects to historic properties that can be avoided by Project construction.

NRS 704.890(1)(e) (Other Permits): In addition to the Commission's UEPA Permit to Construct, additional local permits, state permits, and approvals are required for the Project. Prior to the issuance of the UEPA Permits to Construct, Staff recommends that Noble Solar be ordered to file with the Commission the following, as compliance items, if not already included in the filing:

Phase One: Desert Tortoise Fence

- a. U.S. Department of Interior - Bureau of Land Management – Final Environmental Impact Statement
- b. U.S. Department of Interior - Bureau of Land Management – Record of Decision
- c. U.S. Department of Interior - Bureau of Land Management – Right-of-Way

- d. U.S. Department of Interior - Bureau of Land Management – Limited Notice to Proceed
- e. U.S. Department of Interior, Fish and Wildlife Service – Endangered Species Act Section 7 Biological Opinion (BO)
- f. U.S. Army Corps of Engineers– Clean Water Act Section 404 Jurisdictional Determination
- g. Nevada State Historic Preservation Office – National Historic Preservation Act Section 106 Finding of Eligibility
- h. Nevada Department of Wildlife – Special Purpose Permit
- i. Nevada Department of Wildlife – Wildlife Energy Cost Recovery Fund Program
- j. Clark County – Dust Permit

Phase Two: Temporary Staging Areas, Site Preparation and Access Roads

- a. U.S. Department of Interior - Bureau of Land Management – Final Environmental Impact Statement
- b. U.S. Department of Interior - Bureau of Land Management – Record of Decision
- c. U.S. Department of Interior - Bureau of Land Management – Right-of-Way
- d. U.S. Department of Interior - Bureau of Land Management – Limited Notice to Proceed (Limited or Full, as applicable)
- e. U.S. Department of Interior, Fish and Wildlife Service – Endangered Species Act Section 7 Biological Opinion (BO)
- f. U.S. Army Corps of Engineers– Clean Water Act Section 404 Jurisdictional Determination
- g. Nevada State Historic Preservation Office – National Historic Preservation Act Section 106 Finding of Eligibility
- h. Nevada Department of Wildlife – Special Purpose Permit
- i. Nevada Department of Wildlife – Wildlife Energy Cost Recovery Fund Program
- j. Nevada Division of Environmental Protection – Temporary Groundwater Discharge Permit
- k. Clark County – Dust Permit
- l. Clark County – Special Use Permit
- m. Clark County – Grading Permit

Phase Three: PV Solar Arrays and BESS Facilities

- a. U.S. Department of Interior - Bureau of Land Management – Final Environmental Impact Statement
- b. U.S. Department of Interior - Bureau of Land Management – Record of Decision
- c. U.S. Department of Interior - Bureau of Land Management – Right-of-Way
- d. U.S. Department of Interior - Bureau of Land Management – Limited Notice to Proceed (Limited or Full, as applicable)
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- f. U.S. Army Corps of Engineers– Clean Water Act Section 404 Jurisdictional Determination
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- h. Nevada Department of Wildlife – Special Purpose Permit
- i. Nevada Department of Wildlife – Wildlife Energy Cost Recovery Fund Program
- j. Nevada Division of Environmental Protection – Temporary Groundwater Discharge Permit
- k. Nevada State Fire Marshal – Hazardous Material Storage Permit
- l. Clark County – Dust Permit
- m. Clark County – Special Use Permit
- n. Clark County – Grading Permit

Phase Four: High-Voltage Electrical Infrastructure

- a. U.S. Department of Interior - Bureau of Land Management – Final Environmental Impact Statement
- b. U.S. Department of Interior - Bureau of Land Management – Record of Decision
- c. U.S. Department of Interior - Bureau of Land Management – Right-of-Way
- d. U.S. Department of Interior - Bureau of Land Management – Limited Notice to Proceed (Limited or Full, as applicable)
- e. U.S. Department of Interior, Fish and Wildlife Service – Endangered Species Act Section 7 Biological Opinion (BO)
- f. U.S. Army Corps of Engineers– Clean Water Act Section 404 Jurisdictional Determination
- g. Nevada State Historic Preservation Office – National Historic Preservation Act Section 106 Finding of Eligibility
- h. Nevada Department of Wildlife – Special Purpose Permit
- i. Nevada Department of Wildlife – Wildlife Energy Cost Recovery Fund Program
- j. Nevada Division of Environmental Protection – Temporary Groundwater Discharge Permit
- k. Nevada State Fire Marshal – Hazardous Material Storage Permit
- l. Clark County – Dust Permit
- m. Clark County – Special Use Permit
- n. Clark County – Building Permit

NRS 704.890(1)(f) (Surplus Asset Retirement Plan): A surplus asset retirement plan is not required for the Project since it does not meet the definition of a “surplus” for purposes of surplus assets as defined in NRS 704.7337.

NRS 704.890(1)(g) (Public Interest): Noble Solar has demonstrated in its Application that the Project will serve the public interest. Specifically, the Project has economic and environmental benefits and will be designed, constructed and operated to avoid, minimize and mitigate the adverse effects on the environment. The Project as proposed will connect into the California

Independent System Operator transmission system and provide additional capacity and energy into the western electrical interconnect.

III. Notice and Subsequent Action

Noble Solar published a Notice of Application for a Permit to Construct in the Las Vegas Review-Journal, on July 1, 2026.

On July 15, 2026, the Commission issued a Notice of Application for Utility Environmental Protection Act Permit to Construct Utility Facilities, establishing a deadline of August 12, 2026, for notices of intervention, petitions for leave to intervene, and notices of intent to be a party pursuant to NRS 704.885(1), or to make a limited appearance in the proceeding pursuant to NRS 704.885(2). The Notice was published in the Las Vegas Review-Journal, on July 29, 2026. No requests for interventions or comments were filed with the Commission.

The Nevada State Clearinghouse did not request comments from state agencies regarding the Application for a Utility Environmental Protection Act Permit to Construct Utility Facility.

Conclusion and Recommendations

Noble Solar LLC's Environmental Impact Statement for the Project identifies the nature of the probable effect on the environment and the required mitigation measures. Noble Solar LLC is in the process of obtaining all permits, licenses and approvals required by state and local statutes, regulations, and ordinances.

Staff recommends that the Commission issue an order granting the request of Noble Solar LLC for the issuance of a UEPA Permit for construction of the Project as defined hereinabove, contingent upon Noble Solar LLC obtaining and filing with the Commission as compliance items, if not already included in the filing, the following permits, licenses, and approvals:

Phase One: Desert Tortoise Fence

- a. U.S. Department of Interior - Bureau of Land Management – Final Environmental Impact Statement
- b. U.S. Department of Interior - Bureau of Land Management – Record of Decision
- c. U.S. Department of Interior - Bureau of Land Management – Right-of-Way
- d. U.S. Department of Interior - Bureau of Land Management – Limited Notice to Proceed
- e. U.S. Department of Interior, Fish and Wildlife Service – Endangered Species Act Section 7 Biological Opinion (BO)
- f. U.S. Army Corps of Engineers– Clean Water Act Section 404 Jurisdictional Determination
- g. Nevada State Historic Preservation Office – National Historic Preservation Act Section 106 Finding of Eligibility
- h. Nevada Department of Wildlife – Special Purpose Permit
- i. Nevada Department of Wildlife – Wildlife Energy Cost Recovery Fund Program

- j. Clark County – Dust Permit

Phase Two: Temporary Staging Areas, Site Preparation and Access Roads

- a. U.S. Department of Interior - Bureau of Land Management – Final Environmental Impact Statement
- b. U.S. Department of Interior - Bureau of Land Management – Record of Decision
- c. U.S. Department of Interior - Bureau of Land Management – Right-of-Way
- d. U.S. Department of Interior - Bureau of Land Management – Limited Notice to Proceed (Limited or Full, as applicable)
- e. U.S. Department of Interior, Fish and Wildlife Service – Endangered Species Act Section 7 Biological Opinion (BO)
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- k. Clark County – Dust Permit
- l. Clark County – Special Use Permit
- m. Clark County – Grading Permit

Phase Three: PV Solar Arrays and BESS Facilities

- a. U.S. Department of Interior - Bureau of Land Management – Final Environmental Impact Statement
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- d. U.S. Department of Interior - Bureau of Land Management – Limited Notice to Proceed (Limited or Full, as applicable)
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- j. Nevada Division of Environmental Protection – Temporary Groundwater Discharge Permit
- k. Nevada State Fire Marshal – Hazardous Material Storage Permit
- l. Clark County – Dust Permit
- m. Clark County – Special Use Permit

- n. Clark County – Grading Permit

Phase Four: High-Voltage Electrical Infrastructure

- a. U.S. Department of Interior - Bureau of Land Management – Final Environmental Impact Statement
- b. U.S. Department of Interior - Bureau of Land Management – Record of Decision
- c. U.S. Department of Interior - Bureau of Land Management – Right-of-Way
- d. U.S. Department of Interior - Bureau of Land Management – Limited Notice to Proceed (Limited or Full, as applicable)
- e. U.S. Department of Interior, Fish and Wildlife Service – Endangered Species Act Section 7 Biological Opinion (BO)
- f. U.S. Army Corps of Engineers– Clean Water Act Section 404 Jurisdictional Determination
- g. Nevada State Historic Preservation Office – National Historic Preservation Act Section 106 Finding of Eligibility
- h. Nevada Department of Wildlife – Special Purpose Permit
- i. Nevada Department of Wildlife – Wildlife Energy Cost Recovery Fund Program
- j. Nevada Division of Environmental Protection – Temporary Groundwater Discharge Permit
- k. Nevada State Fire Marshal – Hazardous Material Storage Permit
- l. Clark County – Dust Permit
- m. Clark County – Special Use Permit
- n. Clark County – Building Permit

Once Noble Solar LLC has obtained and filed with the Commission a copy of the outstanding permits needed for the Project, Staff recommends that the UEPA Permit setting forth a description of the Project be issued to Noble Solar LLC.

Staff recommends that the order contain a provision that if Noble Solar LLC does not file with the Commission all the compliances set forth hereinabove within five years of the effective date of the order, the order will be deemed to be vacated without further action by or order of the Commission.

Staff also requests that the Commission include an ordering paragraph in its order which states: “No construction may commence on any utility facilities that are the subject of this Application for a UEPA Permit to Construct until after the Commission has issued the Permit to Construct for the applicable phase of the Project.”

Staff further recommends that the Commission’s order include findings and conclusions that:

- 1) Accept and incorporate the findings and conclusions in Noble Solar LLC’s Environmental Impact Statement for the Project;
- 2) In the Environmental Impact Statement for the Project, Noble Solar LLC determined the nature of the probable effect of the Project on the environment;

- 3) The need for the Project balances any adverse effect on the environment;
- 4) The Project represents the minimum adverse effect on the environment, considering the state of available technology and the nature and economics of the various alternatives;
- 5) Noble Solar LLC has obtained or is in the process of obtaining all other permits, licenses and approvals required by federal, state and local statutes, regulations and ordinances;
and
- 6) The Project will serve the public interest.

A PORTION OF SECTIONS 2, 3, 7, 8, 9, 10, 15, 16, 17, 18, 19, 20, 21, 29 AND 30, TOWNSHIP 22 SOUTH, RANGE 55 EAST, MOUNT DIABLO MERIDIAN (MDM), CLARK COUNTY, NEVADA AS SHOWN ON RECORD OF SURVEY NO. 01335, RECORDED IN FILE 241, PAGE 5 OF SURVEYS, OFFICIAL RECORDS BOOK NO. 20250218, CLARK COUNTY RECORDER, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE QUARTER CORNER COMMON TO SECTIONS 9 AND 10, MARKED BY A 5/8 INCH REBAR WITH A 2-1/2 INCH ALUMINUM CAP STAMPED "WESTWOOD PROFESSIONAL SERVICES RLS 031613 2024", THENCE SOUTH 00°38'27" WEST, ALONG THE EAST LINE OF THE SOUTHEAST QUARTER OF SAID SECTION 9, A DISTANCE OF 2,693.36 FEET TO THE CORNER COMMON TO SECTIONS 9, 10, 15 AND 16, MARKED BY A 5/8 INCH REBAR WITH A 2-1/2 INCH ALUMINUM CAP STAMPED "WESTWOOD PROFESSIONAL SERVICES RLS 031613 2024";

THENCE SOUTH 89°53'26" EAST, ALONG THE SOUTH LINE OF SAID SECTION 10, A DISTANCE OF 364.30 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE NORTH 34°55'58" EAST, A DISTANCE OF 10,186.51 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE NORTH 00°00'00" EAST, A DISTANCE OF 30.30 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE NORTH 89°46'20" WEST, A DISTANCE OF 767.61 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE NORTH 00°08'12" WEST, A DISTANCE OF 295.45 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE NORTH 89°51'48" EAST, A DISTANCE OF 130.00 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE SOUTH 00°08'12" EAST, A DISTANCE OF 166.27 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE SOUTH 89°46'20" EAST, A DISTANCE OF 767.92 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE SOUTH 00°00'00" EAST, A DISTANCE OF 200.69 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE SOUTH 34°55'58" WEST, A DISTANCE OF 11,061.42 FEET TO THE EAST LINE OF THE NORTHEAST QUARTER OF SAID SECTION 16, MARKED BY A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE SOUTH 00°30'19" WEST, ALONG SAID EAST LINE, A DISTANCE OF 518.96 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613", ALSO BEING THE NORTHWESTERLY RIGHT OF WAY LINE OF TECOPA SPRINGS ROAD;

THENCE SOUTH 34°57'28" WEST, ALONG SAID NORTHWESTERLY RIGHT OF WAY LINE, A DISTANCE OF 13,500.40 FEET TO A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613", ALSO BEING THE NORTHERLY RIGHT OF WAY LINE OF CATHEDRAL CANYON ROAD;

THENCE NORTH 84°07'44" WEST, ALONG SAID NORTHERLY RIGHT OF WAY LINE, A DISTANCE OF 8,200.61 FEET TO THE WEST LINE OF THE NORTHWEST QUARTER OF SAID SECTION 30, MARKED BY A 5/8 INCH REBAR WITH A RED PLASTIC CAP MARKED "RLS 031613";

THENCE NORTH 00°08'48" EAST, ALONG SAID WEST LINE, A DISTANCE OF 991.88 FEET TO THE CORNER COMMON TO SECTIONS 19 AND 30, MARKED BY A 2-1/2 INCH GENERAL LAND OFFICE BRASS CAP STAMPED "1934";

THENCE NORTH 00°20'49" WEST, ALONG THE WEST LINE OF THE SOUTHWEST QUARTER OF SAID SECTION 19, A DISTANCE OF 2,642.61 FEET TO THE WEST QUARTER CORNER TO SECTION 19, MARKED BY A 2-1/2 INCH GENERAL LAND OFFICE BRASS CAP STAMPED "1934";

THENCE NORTH 00°26'50" EAST, ALONG THE WEST LINE OF THE NORTHWEST QUARTER OF SAID SECTION 19, A DISTANCE OF 2,663.21 FEET TO THE CORNER COMMON TO SECTIONS 18 AND 19, MARKED BY A 2-1/2 INCH GENERAL LAND OFFICE BRASS CAP STAMPED "1934";

THENCE NORTH 00°25'51" EAST, ALONG THE WEST LINE OF THE SOUTHWEST QUARTER OF SAID SECTION 18, A DISTANCE OF 2,652.67 FEET TO THE WEST QUARTER CORNER TO SECTION 18, MARKED BY A 2-1/2 INCH GENERAL LAND OFFICE BRASS CAP STAMPED "1934";

THENCE NORTH 01°19'03" EAST, ALONG THE WEST LINE OF THE NORTHWEST QUARTER OF SAID SECTION 18, A DISTANCE OF 2,652.04 FEET TO THE CORNER COMMON TO SECTIONS 7 AND 18, MARKED BY A 2-1/2 INCH GENERAL LAND OFFICE BRASS CAP STAMPED "1934";

THENCE NORTH 00°15'40" EAST, ALONG THE WEST LINE OF THE SOUTHWEST QUARTER OF SAID SECTION 7, A DISTANCE OF 2,641.60 FEET TO THE WEST QUARTER CORNER TO SECTION 7, MARKED BY A 2-1/2 INCH GENERAL LAND OFFICE BRASS CAP STAMPED "1934";

THENCE SOUTH 89°30'06" EAST, A DISTANCE OF 5,190.51 FEET TO THE QUARTER CORNER COMMON TO SECTIONS 7 AND 8, MARKED BY A 5/8 INCH REBAR WITH A 2-1/2 INCH ALUMINUM CAP STAMPED "WESTWOOD PROFESSIONAL SERVICES RLS 031613 2024";

THENCE NORTH 89°41'19" EAST, A DISTANCE OF 5,318.47 FEET TO THE QUARTER CORNER COMMON TO SECTIONS 8 AND 9, MARKED BY A 5/8 INCH REBAR WITH A 2-1/2 INCH ALUMINUM CAP STAMPED "WESTWOOD PROFESSIONAL SERVICES RLS 031613 2024";

THENCE SOUTH 89°40'34" EAST, A DISTANCE OF 5,325.44 FEET TO THE **POINT OF BEGINNING**.

CONTAINING 194,351,105 SQUARE FEET OR 4,461.69 ACRES, MORE OR LESS.

AS SHOWN ON EXHIBIT B, ATTACHED HERETO AND MADE PART HEREOF.

BEARINGS, DISTANCES AND AREAS ARE BASED ON NEVADA STATE PLANE COORDINATE SYSTEM, EAST ZONE, NAD83 (2011), US FOOT. THE DISTANCES SHOWN HEREIN ARE GRID DISTANCES. THE COMBINED SCALE FACTOR IS 0.99974729.

SUBJECT TO ANY EASEMENTS, RIGHTS OF WAY, AND OTHER ENCUMBRANCES OF RECORD.