

December 21, 2016

Mr. Brian Hocutt
Cooperative Energy
P.O. Box 15849
Hattiesburg, MS 39402

Re: CCR Fault Areas Certification
R.D. Morrow, Sr. Generating Station
Purvis, Lamar County, Mississippi

Dear Mr. Hocutt:

Cooperative Energy (formerly South Mississippi Electric Power Association) retained Environmental Management Services, Inc. (EMS) to evaluate Cooperative Energy's compliance with the Federal Coal Combustion Residuals Rule (CCR Rule) requirements in accordance with 40 CFR 257.62 which states:

“(a) New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located within 60 meters (200 feet) of the outermost damage zone of a fault that has had a displacement in Holocene time unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that an alternative setback distance of less than 60 meters (200 feet) will prevent damage to the structural integrity of the CCR unit.”

Cooperative Energy has two existing CCR surface impoundments including: 1) the Emergency Scrubber Surge Pond, and 2) the Scrubber Supply Pond. Cooperative Energy has an existing CCR landfill, but does not have a “new CCR landfill”, nor does it currently have a lateral expansion of any CCR unit. Therefore, at this time, only the two existing CCR surface impoundments are subject to 40 CFR 257.62.

§257.62 Fault Areas

EMS contacted Mr. David Dockery, MDEQ Department of Geology, who indicated that no known faulting existed within the Holocene in the project area. The closest mapped faults on the attached Structural Features of Mississippi (2009) map indicate the location of faults on contour maps of the Tuscaloosa (Upper Cretaceous).

The publication Geologic Evaluation of Gulf Coast Salt Domes: Overall Assessment of the Gulf Interior Region, Section 3.1 Tectonic Stability, dated October 1981, was reviewed as a reference. The document states the following:

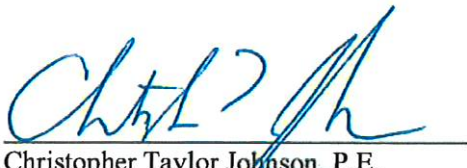
“The Upper Gulf Coastal Plain appears tectonically stable, having been subjected only to crustal movements, mainly downward, since the Late Triassic.”

"Tectonic activity related to rifting and block faulting occurred in Late Triassic time and resulted in the formation of the Gulf Basin and subregional blocks of varying crustal thickness within it. Subsequently the region has been nontectonic, affected mainly by sedimentary and epeirogenic processes. The latest igneous activity known in the Upper Gulf Coastal Plain occurred in Late Cretaceous time. Normal faulting is present, related to differential sedimentary thickness and flexures. The entire Gulf Basin is a region of low seismicity."

Based on the forgoing information, we conclude that the regulated CCR units are not located within 60 meters (200 feet) of the outermost damage zone of a fault that has had a displacement in Holocene time.

Engineer's Certification

I hereby certify, as a Professional Engineer in the State of Mississippi, that the information in this document was assembled under my direct personal charge and that this determination was conducted in accordance with and meets the requirements of 40 CFR Part 257.62(a).



Christopher Taylor Johnson, P.E.
Mississippi Professional Engineer No. 15761

Date: 12/21/2016



Geologist's Certification

I have reviewed the portions of this report having to do with geology in sufficient depth to accept full responsibility for those contents.



Kenneth D. Ruckstuhl, RPG
MS Professional Geologist No. 0090

Date: 12/21/2016



Attachment – Structural Features of Mississippi, Map.

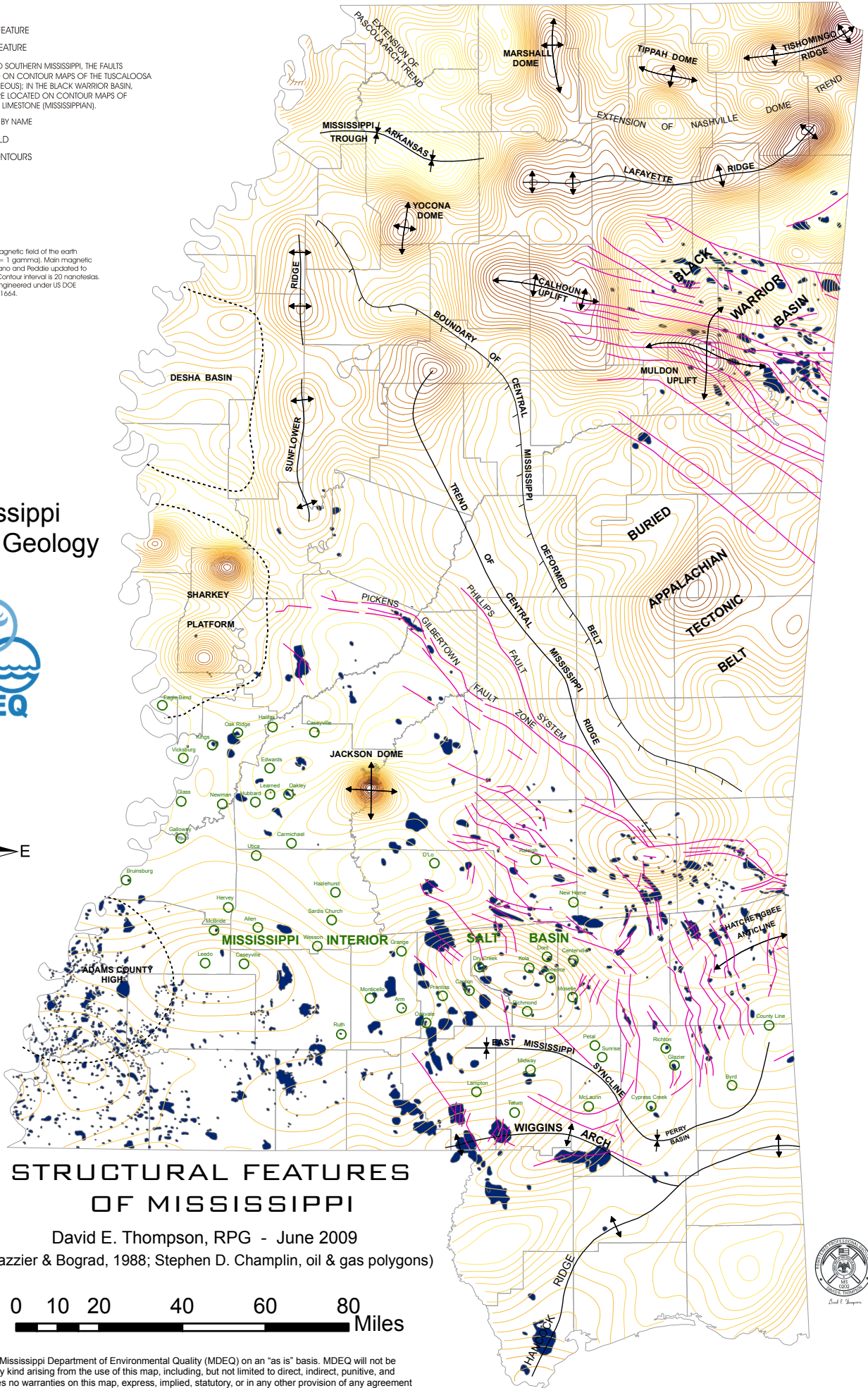
File: Fault Areas

Attachment

LEGEND

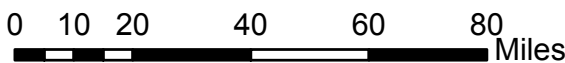
- +— AXIS OF ANTICLINAL FEATURE
 - +— AXIS OF SYNCLINAL FEATURE
 - FAULT - IN CENTRAL AND SOUTHERN MISSISSIPPI, THE FAULTS WERE LOCATED ON CONTOUR MAPS OF THE TUSCALOOSA (UPPER CRETACEOUS); IN THE BLACK WARRIOR BASIN, THE FAULTS WERE LOCATED ON CONTOUR MAPS OF THE MILLERELLA LIMESTONE (MISSISSIPPIAN).
 - SALT DOME - LABELED BY NAME
 - OIL AND/OR GAS FIELD
 - AEROMAGNETIC CONTOURS
 - 900 to -800
 - 799 to -700
 - 699 to -600
 - 599 to -500
 - 499 to -400
 - 399 to -300
 - 299 to -200
 - 199 to -100
 - 99 to 40
- Residual of total intensity magnetic field of the earth in nanoteslas (1 nanotesla = 1 gamma). Main magnetic field of the earth from Fagan and Peddie updated to 1975 has been removed. Contour interval is 20 nanoteslas.
 Prepared by Benck, Field Engineer under US DOE Contract #DE-AC07-76GJ01664.

Mississippi
Office of Geology



**STRUCTURAL FEATURES
OF MISSISSIPPI**

David E. Thompson, RPG - June 2009
(after Gazzier & Bograd, 1988; Stephen D. Champlin, oil & gas polygons)



This map is provided by the Mississippi Department of Environmental Quality (MDEQ) on an "as is" basis. MDEQ will not be liable for any damages of any kind arising from the use of this map, including, but not limited to direct, indirect, punitive, and consequential. MDEQ makes no warranties on this map, express, implied, statutory, or in any other provision of any agreement or communication, and specifically disclaims any implied warranties of merchantability or fitness for a particular purpose.