



REPORT

Location Restrictions Demonstration - Drains Pond System

Great River Energy - Coal Creek Station

Submitted to:

Great River Energy

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1893823

October 16, 2018

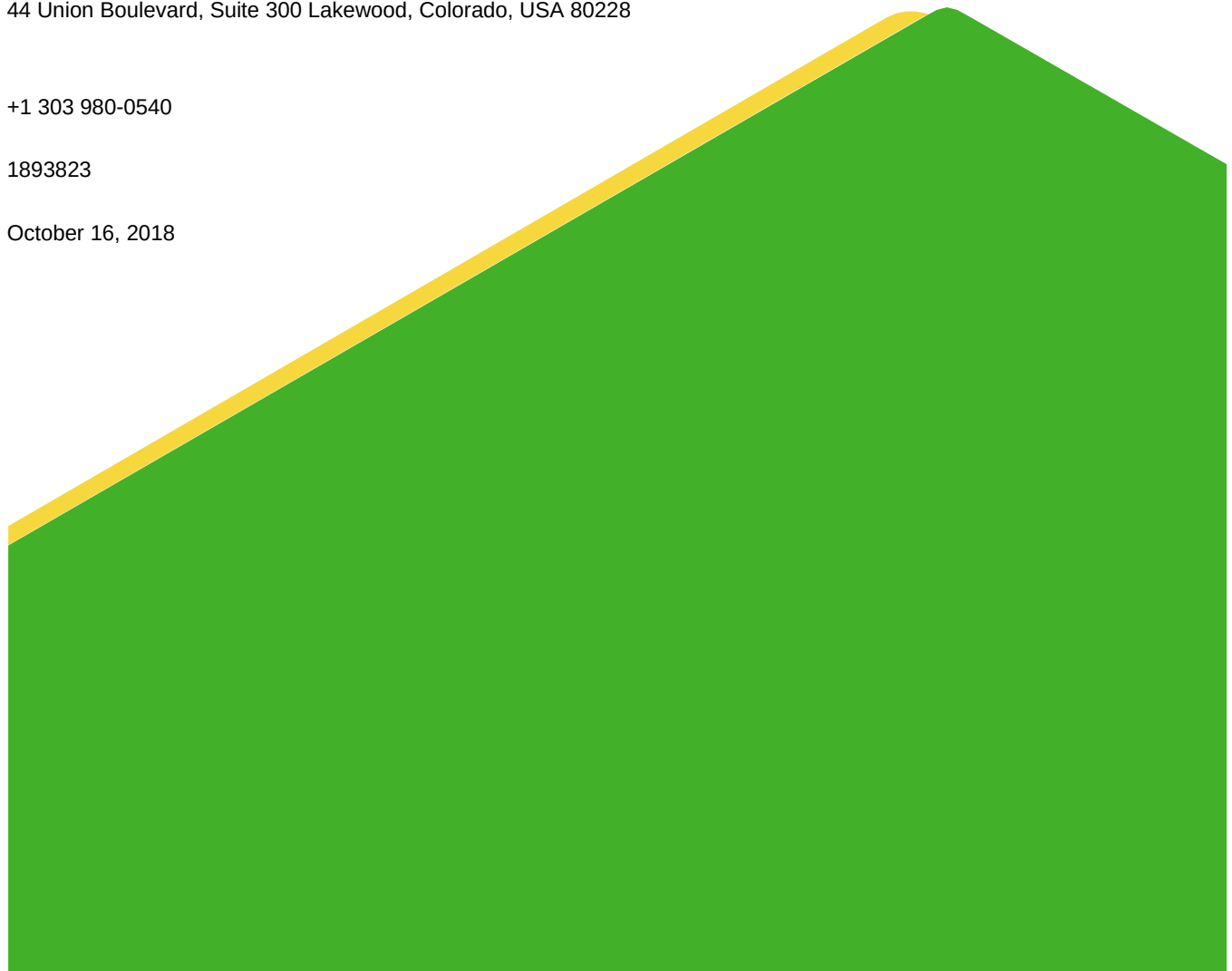


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1.0 INTRODUCTION

This report presents documentation and certification of the Location Restrictions Demonstration for the Drains Pond System CCR Surface Impoundment (Drains Pond System) at Great River Energy's (GRE) Coal Creek Station (CCS). The Drains Pond System is an existing coal combustion residuals (CCR) surface impoundment. This report addresses the requirements of the United States Environmental Protection Agency's (EPA's) CCR rule (40 CFR 257.60 through 257.64, (EPA, 2015)). The location restrictions as defined in the CCR rule are summarized in the following sections.

1.1 Site Background

CCS is a coal-fired electric generation facility located in McLean County, North Dakota, approximately 10 miles northwest of Washburn, North Dakota. CCRs are managed in composite-lined surface impoundments and dry waste landfill facilities regulated and permitted by the North Dakota Department of Health (NDDH) in accordance with North Dakota Administrative Code (NDAC) Article 33-20, Solid Waste Management and Land Protection.

CCS has four CCR facilities that are within the purview of the EPA CCR rule (Figure 1):

- Drains Pond System CCR Surface Impoundment (Drains Pond System) is located in the south-central portion of the plant site, northeast of the plant buildings.
- Upstream Raise 91 CCR Surface Impoundment (Upstream Raise 91) is located in the south-central portion of the plant site, east of the plant buildings.
- Upstream Raise 92 CCR Surface Impoundment (Upstream Raise 92) is located in the southeast portion of the plant site, between Upstream Raise 91 and Southeast Section 16 CCR Landfill.
- Southeast Section 16 CCR Landfill (Southeast 16) is located in the southeast portion of the plant site, east of Upstream Raise 92.

The Drains Pond System is designed with three interconnected cells (west cell, center cell, east cell) that may be used to dewater CCRs including bottom ash and economizer ash. The Drains Pond System is part of the plant process water storage inventory and acts as a clarifier for the process water conveyed with the CCRs.

2.0 LOCATION RESTRICTIONS

The location restrictions are found within the following sections of the Code of Federal Regulations:

- 40 CFR 257.60 – Placement above the uppermost aquifer
- 40 CFR 257.61 – Wetlands
- 40 CFR 257.62 – Fault areas
- 40 CFR 257.63 – Seismic impact zones
- 40 CFR 257.64 – Unstable areas

Per the CCR rule definitions, the Drains Pond System is considered an existing CCR surface impoundment and is subject to each of the location restriction requirements above.

3.0 PLACEMENT ABOVE THE UPPERMOST AQUIFER

Per 40 CFR 257.60, the base of existing and new CCR surface impoundments, new CCR landfills, and all lateral expansions must be no less than five feet (1.52 meters) above the uppermost aquifer, or a demonstration must be made that there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations, including fluctuations due to the seasonal high water table. The CCR rule defines the uppermost aquifer as the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers that are hydraulically interconnected with this aquifer within the facility's property boundary.

To provide support for the groundwater separation demonstration, groundwater levels were measured in the monitoring wells and piezometers surrounding the Drains Pond System from June 2017 through June 2018 (Figure 2). This was done to evaluate the normal fluctuations (including seasonal high water table) of groundwater elevation in the area of the Drains Pond System.

Based on this measured data, the groundwater level fluctuated up to approximately 2.8 feet at individual wells/piezometers between June 2017 and June 2018. Groundwater contours were drawn based on the measured groundwater levels from October 2017 since groundwater levels were measured at additional site piezometers during this period, providing more detailed information for the development of groundwater contours. These groundwater contours were then compared to the as-built bottom of composite liner grades (Interstate Engineering, 1994) (Bartlett & West, 2015). Figure 3 provides a visualization of the separation between the bottom of the composite liner (bottom of two feet of mechanically compacted clay liner) and the October 2017 groundwater contours. Most of the Drains Pond System footprint has a separation between the bottom of the composite liner and groundwater greater than 5 feet. A small area in the southwest corner of the east cell of the Drains Pond System indicates a minimum separation of approximately 3.0 feet. From June 2017 through June 2018, the piezometer nearest to the southwest corner of the east cell of the Drains Pond System (DP-B) showed groundwater elevations up to approximately 1.5 feet higher than the October 2017 readings. Therefore, the separation between the bottom of the composite liner and groundwater is anticipated to be greater than approximately 1.5 feet after considering potential site variations, including anticipated site seasonality based on the information collected.

Based on information acquired between June 2017 and June 2018, the base of the liner system for the Drains Pond System is above the upper limits of the uppermost aquifer and no intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer exists.

4.0 WETLANDS

Per 40 CFR 257.61, existing and new CCR surface impoundments, new CCR landfills, and all lateral expansions must not be located in wetlands, unless a specific demonstration has been made by the owner or operator of a CCR unit ensuring that the unit will not degrade sensitive wetland ecosystems. Wetlands are areas that are inundated or saturated by surface or groundwater at a frequency and over a duration sufficient to support a prevalence of vegetation typically adapted for life in saturated soil conditions, and may include marshes, swamps, bogs, or other similar areas.

The east cell of the Drains Pond System was constructed in the late 1970s as an above-grade impoundment with grass covered perimeter earthen embankments and is located several hundred feet uphill of Samuelson Slough (closest surface water body). The west cell and center cell were constructed in 2015 in an area that received fill during construction of CCS. Prior to the 2015 construction of the west and center cells, the location was vegetated with grass and had a surface water drainage channel. Surface water was permanently re-routed during construction

of the facility, which was mostly constructed as an above-grade impoundment with grass covered perimeter earthen embankments (Golder, 2015).

There are no visual indications suggesting the impoundment is located in wetlands. In addition, the NDDH, as part of the permit requirements of each facility, has previously accepted that the Drains Pond System is not located in wetlands (Golder, 2004) (Golder, 2015).

The Drains Pond System is not located in wetlands.

5.0 FAULT AREAS

Per 40 CFR 257.62, new CCR landfills, new and existing CCR surface impoundments, and all lateral expansions must not be located within 200 feet of a fault (or the outermost damage zone of a fault) that has had displacement in Holocene time, unless a demonstration can be made that an alternative setback distance of less than 200 feet will not result in damage to the structural integrity of the unit. Holocene time is defined as the geological epoch which began at the end of the Pleistocene, roughly 11,700 years before the present, and continues to present time.

As evidence of being outside of fault areas, Figures 4 through 6 contain images derived from the United States Geological Survey's (USGS) Earthquake Hazards Program's U.S. Quaternary Faults and Folds Database. An overall map of the known faults in the contiguous United States is shown in Figure 4, while Figure 5 focuses on North Dakota. No known quaternary faults are located in the state of North Dakota. Further, Figure 6 provides the 2018 national earthquake probability map. North Dakota as a whole is predicted to have a less than 1% chance of potentially minor-damage ground shaking in 2018 (Petersen, et al., 2018).

The Drains Pond System is not located within 200 feet of a fault (or the outermost damage zone of a fault) that has had displacement in Holocene time.

6.0 SEISMIC IMPACT ZONES

Per 40 CFR 257.63, new CCR landfills, new and existing CCR surface impoundments, and all lateral expansions must not be located in seismic impact zones, unless a demonstration is made that shows all structural components, including liner, leachate collection systems, and surface water control systems are designed to resist the maximum horizontal acceleration in lithified earth material from a probable earthquake at the site. A seismic impact zone is defined as an area having a 2% or greater probability that the maximum expected horizontal acceleration, expressed as a percentage of the earth's gravitational pull (g), will exceed 0.10 g in 50 years. Maximum horizontal acceleration in lithified earthen materials is defined as the maximum expected horizontal acceleration at the ground surface as depicted on a seismic hazard map, with a 98% or greater probability that the acceleration will not be exceeded in 50 years.

Figure 7 is a map prepared by the USGS (Petersen, et al., 2014) showing the nationwide 2% probability in 50 years of exceedance of peak ground acceleration. On the map, the majority of North Dakota, including CCS, is given a 2% probability of exceeding 0.02 g in 50 years, below the 0.10 g threshold for defining a seismic impact zone.

The Drains Pond System is not located in a seismic impact zone.

7.0 UNSTABLE AREAS

Per 40 CFR 257.64, new and existing CCR landfills, new and existing CCR surface impoundments, and all lateral expansions must not be located in unstable areas, unless a demonstration can be made that shows the structural components of the unit will not be disrupted. The rule defines an unstable area as a location that is susceptible to

natural or human-induced events or forces capable of impairing the integrity of some or all of the structural components responsible for preventing releases from a CCR unit. Unstable areas can include poor foundation conditions, areas susceptible to mass movements, and karst terrains. Per the rule, structural components are any component used in the construction and operation of the unit that are necessary to ensure the integrity of the unit and to prevent a release, and can include liners, leachate collection systems, embankments, spillways, outlets, final covers, and inflow design flood control systems.

Per the rule, the following factors were considered in determining whether the facilities have been located within unstable areas:

- On-site or local soil conditions that may result in significant differential settlement;
- On-site or local geologic or geomorphologic features; and
- On-site or local human-made features or events (both surface and subsurface).

Potential indications of unstable areas are evaluated during the annual visual inspections required to satisfy 40 CFR Part 257.83. These inspections are specifically meant to assess hydraulic structures, upstream and downstream slopes, berm crests, and the toe of the facility to look for signs of structural weakness, differential settlement, or other conditions that could affect stability. No evidence of differential settlement or other indications of unstable areas has been observed at the facility during the annual inspections performed in 2015, 2016, 2017, and 2018 (Golder, 2016a) (Golder, 2017) (Golder, 2018) (2018 inspection report not yet issued).

An assessment of structural stability and slope stability was completed for the Drains Pond System in 2016 (Golder, 2016b). This assessment evaluated foundation conditions as well as overall mass movement of the facility and indicated that no structural stability deficiencies were identified.

7.1 Soil Conditions

The Drains Pond System is generally constructed over a glacial till layer consisting of sand and silty-clay soils. Glacial till varies in thickness from 20 feet to several hundred feet in the area of CCS. Silty-sand and sand lenses are present throughout the glacial till formation, which is underlain by poorly consolidated siltstone/sandstone bedrock (Barr, 1982) (CPA and UPA, 1989).

The foundation soils of the east cell of the Drains Pond System consist of native soils (sandy and silty-clay) and embankment fill materials sourced from nearby native soils (sandy and silty clay). The east cell of the Drains Pond System was relined in 1993. According to construction documents, the foundation materials were compacted to 93% standard Proctor density (CPA, 1993).

The area where the west and center cells of the Drains Pond System is constructed was disturbed during original plant construction in the late 1970's, which resulted in the presence of fill materials near the surface. In general, borings under the area of the Drains Pond System showed approximately 15 feet of "fill" material underlain by lean clay and/or fat clay. According to construction documents, the foundation materials were compacted to 95% standard Proctor density (Golder, 2016c).

Based on historic site information of CCRs and native soils, observations, and geotechnical testing, the Drains Pond System is not built over wet ash or other unsuitable materials and foundation soils are stable.

Foundation site soil conditions do not indicate that the facility is located in an unstable area susceptible to significant differential settlement and the facilities are not anticipated to permanently store large quantities of CCR, meaning

that vertical stresses caused by loading of the liner and/or foundation elements of the Drains Pond System are anticipated to be relatively minor (Golder, 2015). Additionally, the site facilities are routinely inspected for both state and federal regulatory requirements. The facility will continue to be inspected per state and federal regulatory requirements, and signs of significant differential settlement will be documented and corrected as needed.

7.2 Geologic and Geomorphologic Features

CCS and McLean County are situated at the eastern-most extent of the Williston Basin, a structural and sedimentary basin (USGS, 1999). The region is characterized by the presence of glacial drift, reaching thicknesses of several hundred feet, and overlying the Sentinel Butte Member, the source of commercially mined coal in the direct vicinity of CCS (Falkirk Mining Company, 1979). The Sentinel Butte Member is the highest strata of the Paleocene Fort Union Formation, overlying the Tongue River, Ludlow, and Cannonball Members (USGS, 1999). The Sentinel Butte Member is marked by drab-gray units, separating it from the lower Tongue River Member.

The site geology of CCS includes unconsolidated surficial deposits of the Coleharbor formation consisting of stratified and unstratified glacial drift. The near-surface materials are silty clay and sandy clay till with interbedded sand lenses (CPA and UPA, 1989). Karst is not known to exist at CCS based on USGS information (USGS, 2004) or site historical information from site borings and test pits (see Figure 8).

7.3 Human-Made Features

Although commercial mining occurs in the vicinity of CCS, no prior mining has occurred within the footprint of the facility, or adjacent to the facility, that would undermine the stability of the facility.

No significant fills, excavations, or structures are present adjacent to the facilities.

The Drains Pond System is not located in an unstable area caused by human-made features.

8.0 CERTIFICATION

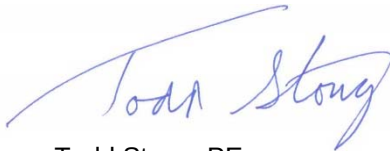
The undersigned attest to the completeness and accuracy of the above written Location Restrictions Demonstration and certify that the location of the Drains Pond System at CCS meets the requirements detailed in 40 CFR 257.60 through 257.64, summarized as follows:

- 40 CFR 257.60 – Placement above the uppermost aquifer
 - Based on information acquired between June 2017 and June 2018, the base of the liner system for the Drains Pond System is above the upper limits of the uppermost aquifer and no intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer exists.
- 40 CFR 257.61 – Wetlands
 - The Drains Pond System is not located in wetlands.
- 40 CFR 257.62 – Fault areas
 - The Drains Pond System is not located within 200 feet of a fault (or the outermost damage zone of a fault) that has had displacement in Holocene time.
- 40 CFR 257.63 – Seismic impact zones

- The Drains Pond System is not located in a seismic impact zone.
- 40 CFR 257.64 – Unstable areas
 - The Drains Pond System is not located in an unstable area.

Golder Associates Inc.

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Senior Project Engineer



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Associate and Senior Consultant



CCS/TJS/ds

https://golderassociates.sharepoint.com/sites/22722g/deliverables/report/ccs_dps_locationdemo rpt_fnl_16oct18/18939823_dps_location_demo_fnl_16oct18.docx

9.0 REFERENCES

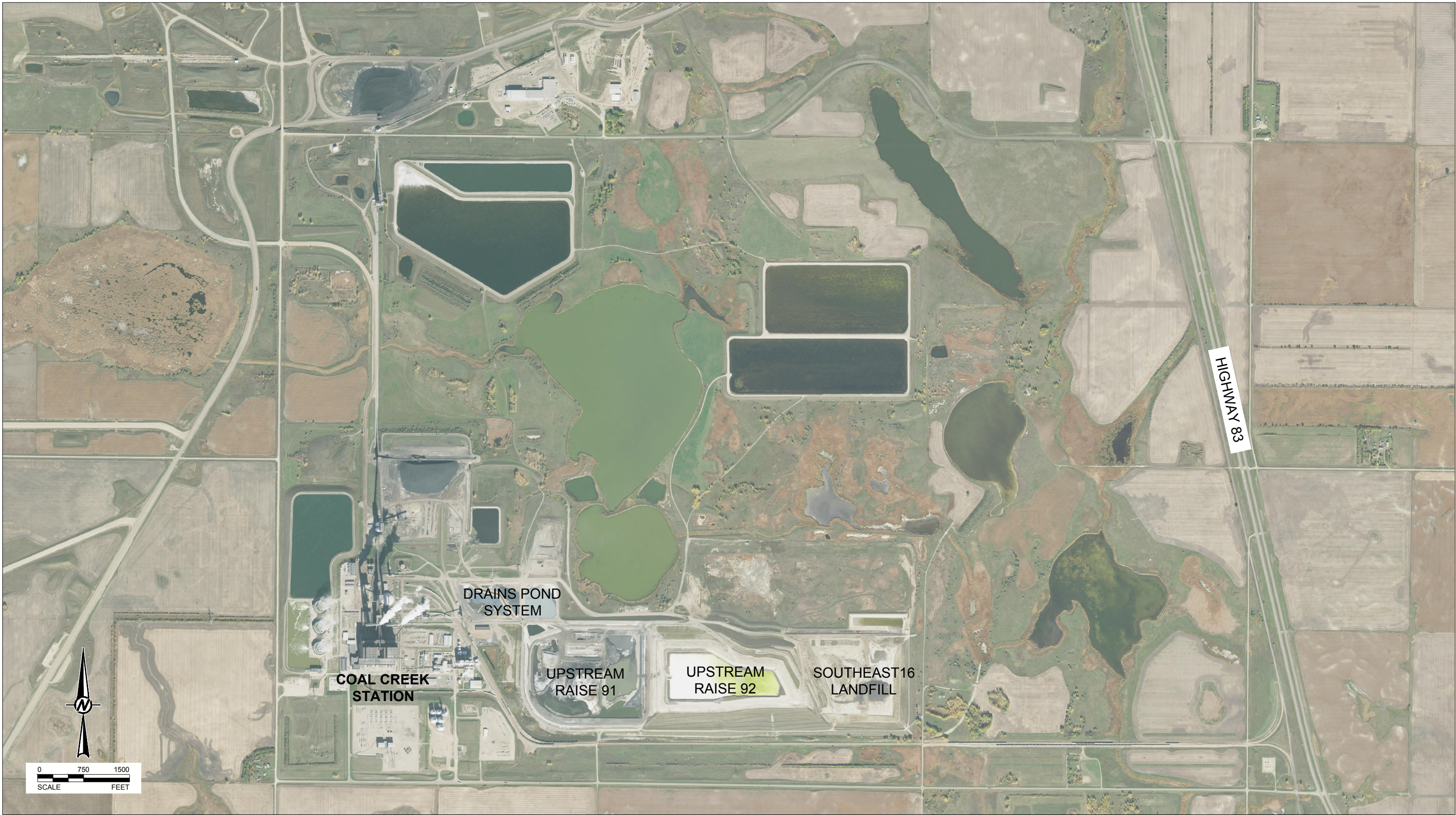
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- Petersen, M. D., Mueller, C. S., Moschetti, M. P., Hoover, S. M., Rukstales, K. S., McNamara, D. E., . . . Cochran, E. S. (2018). 2018 One-Year Seismic Hazard Forecast for the Central and Eastern United States from Induced and Natural Earthquakes. *Seismological Research Letters*, 89(3), 1049-1061. Retrieved from <https://doi.org/10.1785/0220180005>
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FIGURE 1

Coal Creek Station CCR Facilities

Path: \\Denver\\gsd\\GREAT RIVER ENERGY\\COAL CREEK\\09_PROJECT\\S1893823\\Groundwater_Separation\\1_Files\\Name_Figure1.dwg



REFERENCES

1. AERIAL IMAGE FROM UNITED STATES DEPARTMENT OF AGRICULTURE NATIONAL AERIAL IMAGERY PROGRAM, PUBLISHED 2017.

CLIENT
GREAT RIVER ENERGY
COAL CREEK STATION
UNDERWOOD, NORTH DAKOTA

CONSULTANT	YYYY-MM-DD	2018-09-12
	DESIGNED	RFS
	PREPARED	KAC
	REVIEWED	CCS
	APPROVED	TJS



PROJECT
LOCATION RESTRICTION DEMONSTRATION

TITLE
COAL CREEK STATION CCR FACILITIES

PROJECT NO.
1893823

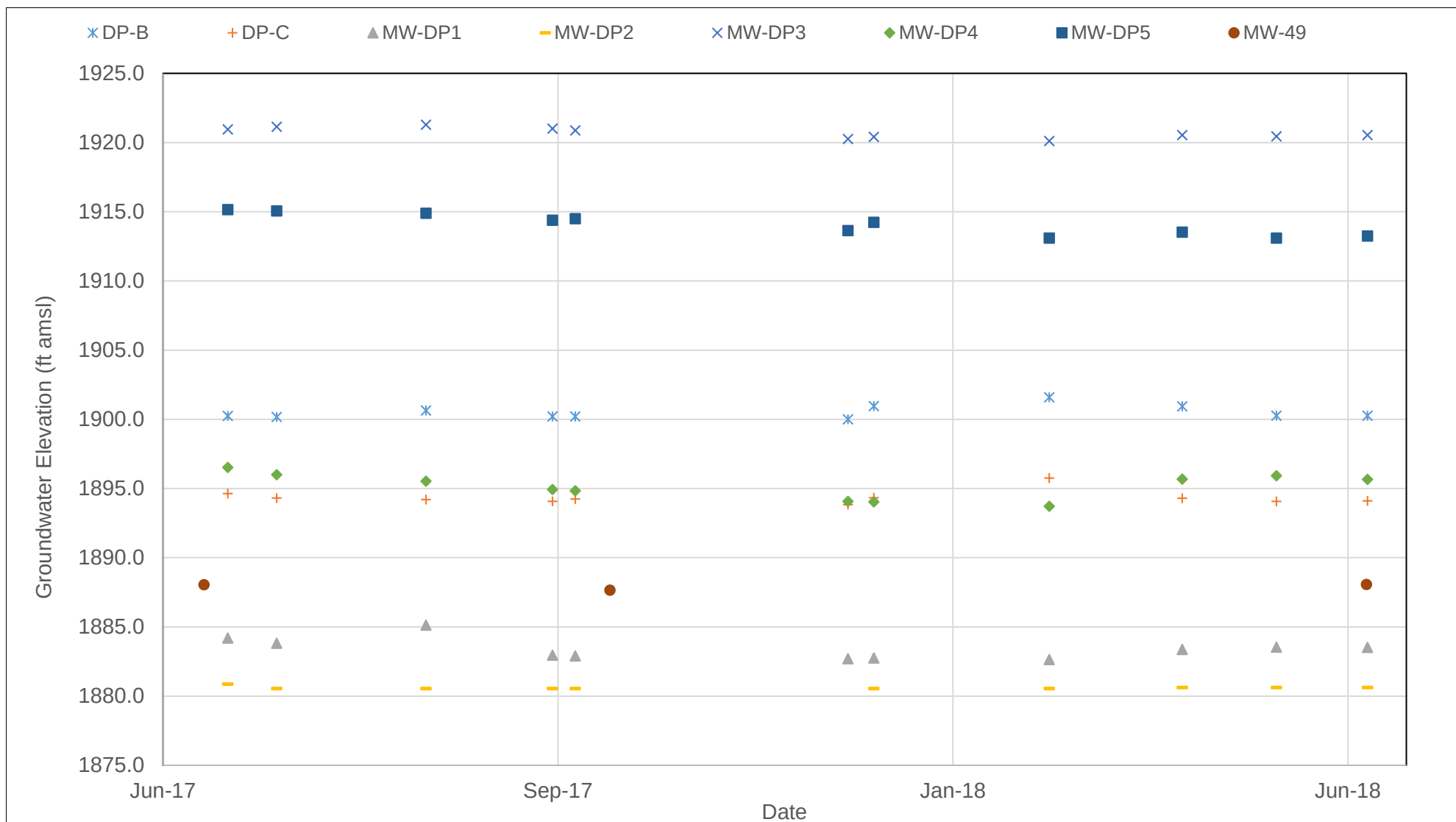
REV.
A

FIGURE
1

1 in IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

FIGURE 2

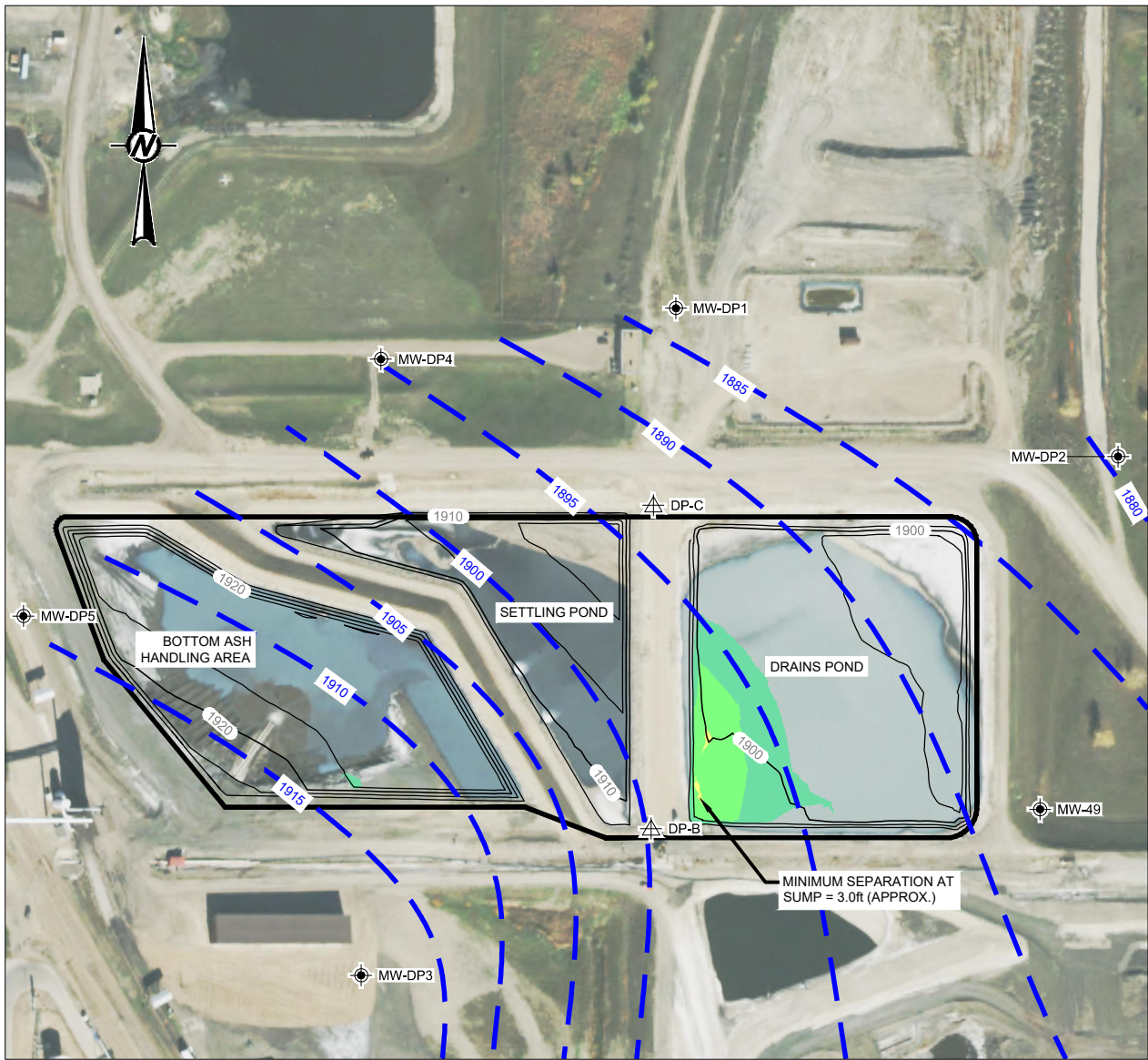
**Groundwater Level Measurements
(June 2017 through June 2018)**



 GOLDER DENVER, COLORADO	Groundwater Level Measurements (June 2017 through June 2018) Drains Pond System	
	9/17/2018	Job No. 1893823
GREAT RIVER ENERGY COAL CREEK STATION	1893823_CCS_GWElev_All.xlsx	Figure 2

FIGURE 3

Groundwater Separation October 2017 Water Levels



LEGEND

- 1908 BOTTOM OF LINER GRADES (REFERENCE 2)
- 1900 GROUNDWATER ELEVATION CONTOUR - OCTOBER 2017 (NOTE 1)
- APPROXIMATE EXTENTS OF LINED SURFACE IMPOUNDMENT
- MONITORING WELL
- PIEZOMETER

NOTE(S)

- GROUNDWATER ELEVATION CONTOURS WERE INTERPRETED FROM WATER LEVELS MEASURED IN MONITORING WELLS AND PIEZOMETERS ON OCTOBER 2017.
- GROUNDWATER ELEVATION CONTOUR INTERVALS ARE FIVE FEET.
- BOTTOM OF LINER CONTOUR INTERVALS ARE FIVE FEET.
- ADDITIONAL INFORMATION (SURFACE WATER BODIES AND ADDITIONAL MONITORING WELLS/PIEZOMETERS) NOT SHOWN WAS CONSIDERED WHEN CREATING GROUNDWATER ELEVATION CONTOURS.

REFERENCE(S)

- AERIAL IMAGES FROM THE UNITED STATES DEPARTMENT OF AGRICULTURE NATIONAL AERIAL IMAGERY PROGRAM ACQUIRED IN 2017 AND DRONE SURVEY PERFORMED BY GRE ON MAY 16, 2018. THE LOCATION OF THE AERIAL IMAGE IS APPROXIMATE.
- BOTTOM OF LINER GRADES REPRESENT THE BOTTOM OF THE COMPOSITE LINER SYSTEMS (BOTTOM OF CLAY AND/OR GEOSYNTHETIC CLAY LINER) AND ARE BASED ON AS-BUILT INFORMATION PROVIDED BY GRE.

GROUNDWATER SEPARATION (GROUNDWATER TO BOTTOM OF LINER IN FEET)

NUMBER	MINIMUM	MAXIMUM	COLOR
1	0.0	1.0	
2	1.0	2.0	
3	2.0	3.0	
4	3.0	4.0	
5	4.0	5.0	

*THE LACK OF SHADING INDICATES GROUNDWATER SEPARATION IS GREATER THAN FIVE FEET.



CLIENT
GREAT RIVER ENERGY
COAL CREEK STATION
UNDERWOOD, NORTH DAKOTA

CONSULTANT



YYYY-MM-DD 2018-09-06
DESIGNED KAC
PREPARED KAC
REVIEWED CCS
APPROVED TJS

PROJECT
COAL CREEK STATION
CCR SITING DEMONSTRATION
PLACEMENT ABOVE THE UPPERMOST AQUIFER

TITLE
GROUNDWATER SEPARATION
OCTOBER 2017 WATER LEVELS
DRAINS POND SYSTEM

PROJECT NO.
1893823

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A

FIGURE
3

FIGURE 4

USGS Quaternary Faults and Folds Database Map – United States

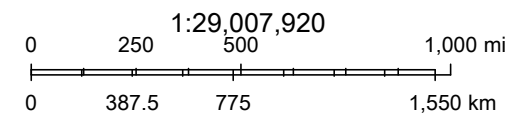
USGS Quaternary Faults and Folds Database



May 30, 2018

Quaternary Faults

- historical (<150 years), well constrained location
- latest Quaternary (<15,000 years), well constrained location
- - - historical (<150 years), moderately constrained location
- - - latest Quaternary (<15,000 years), moderately constrained location
- historical (<150 years), inferred location



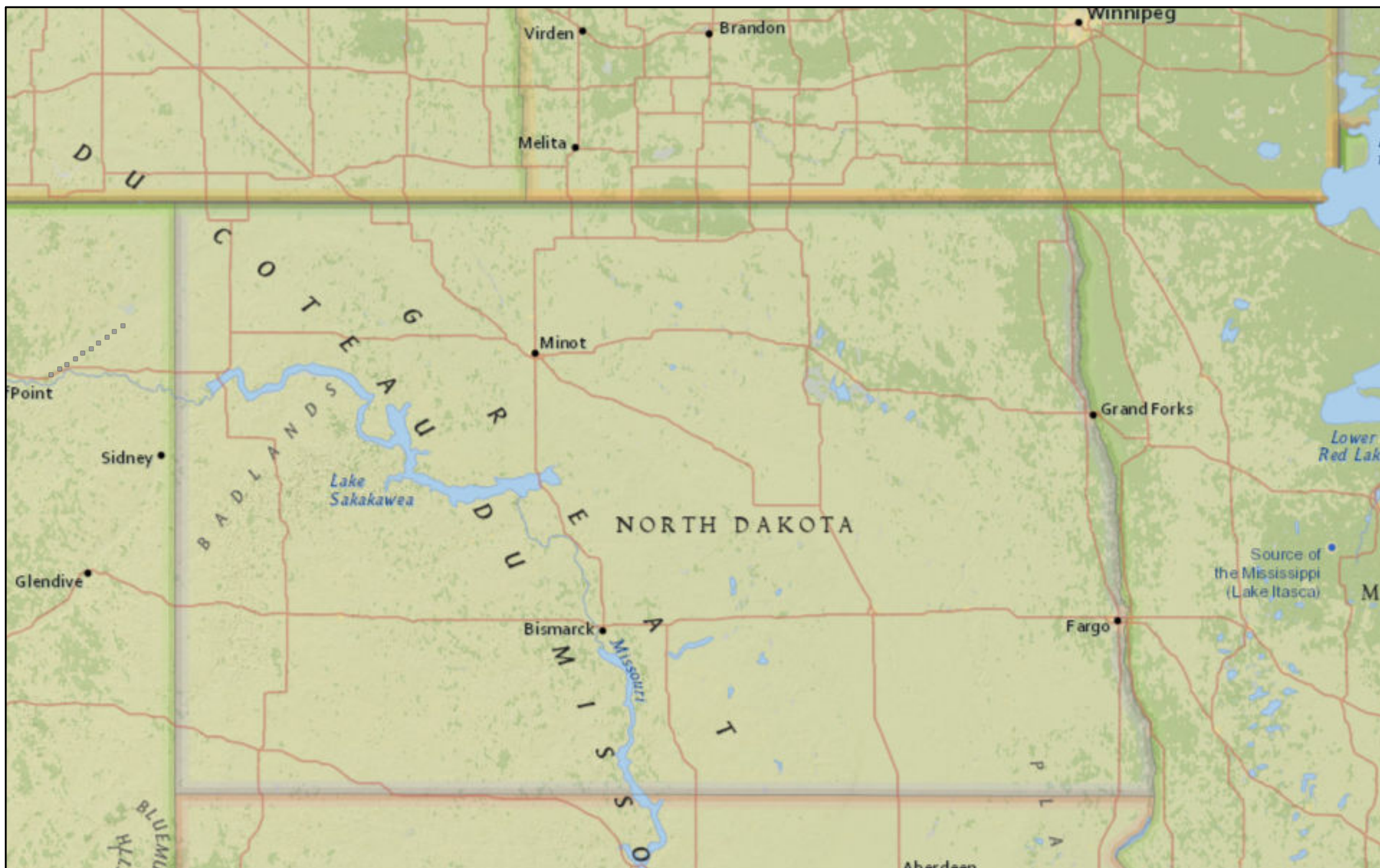
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Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp. |

FIGURE 5

**USGS Quaternary Faults and Folds
Database Map – North Dakota**

USGS Quaternary Faults and Folds Database - North Dakota



May 30, 2018

▲ Site Investigations

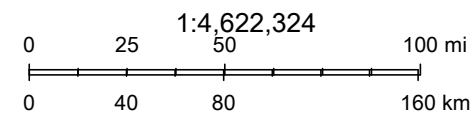
Quaternary Faults

— historical (<150 years), well constrained location

- - historical (<150 years), moderately constrained location

- - historical (<150 years), inferred location

— latest Quaternary (<15,000 years), well constrained location

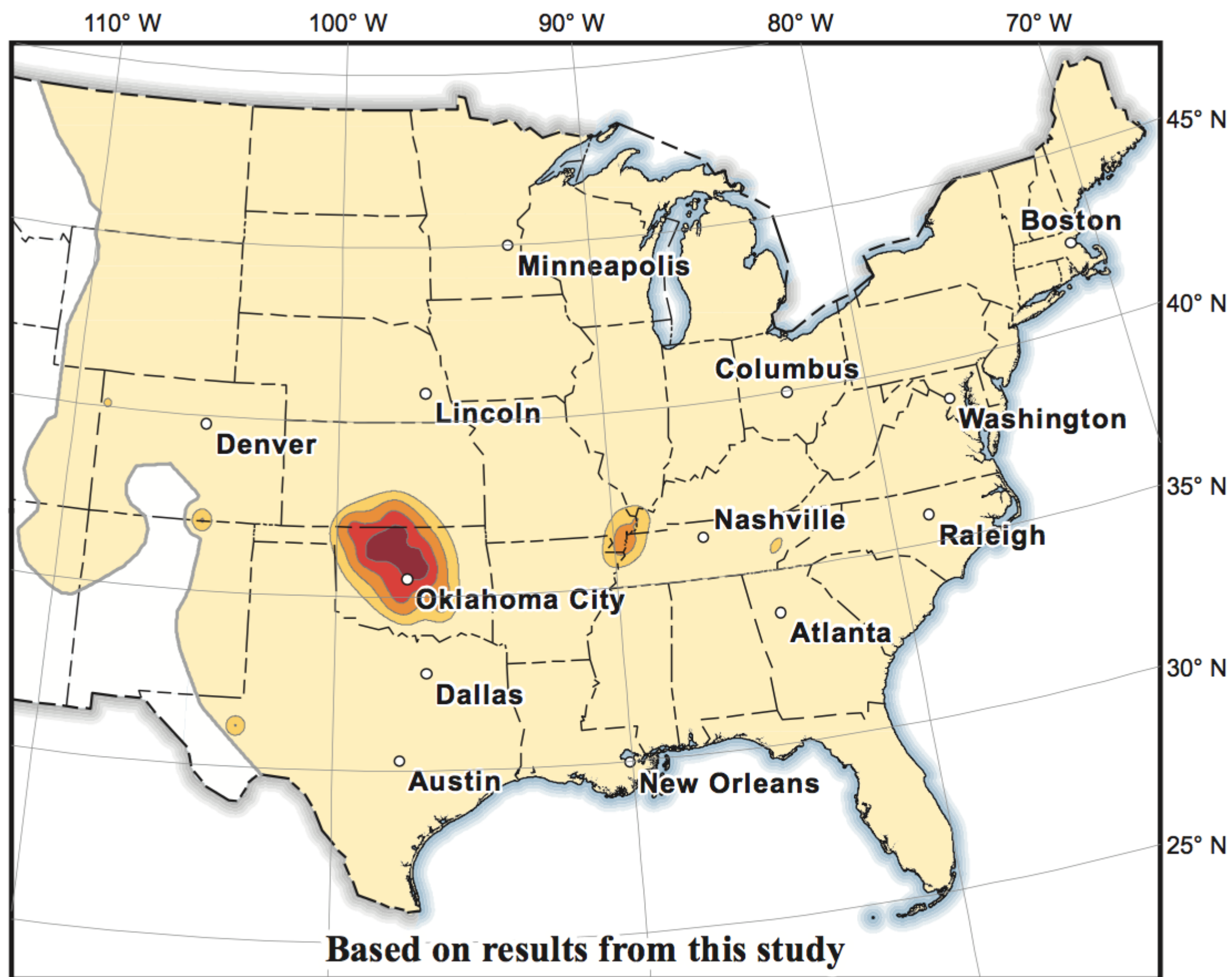
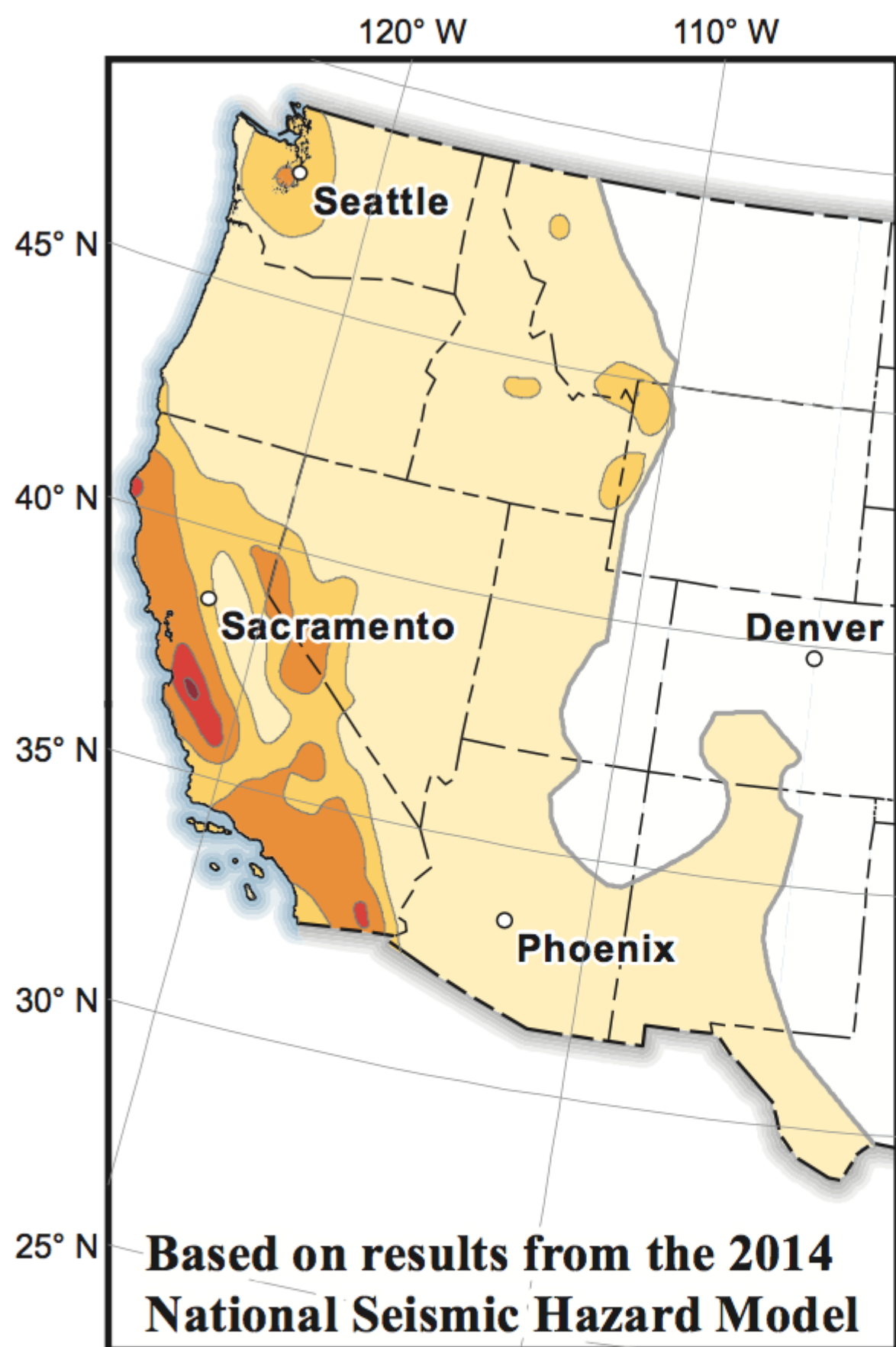


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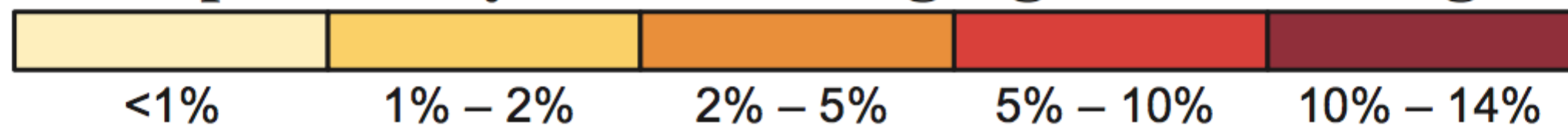
Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp. |

FIGURE 6

Chance of Potentially Minor
Damage Ground Shaking in
2018 Map



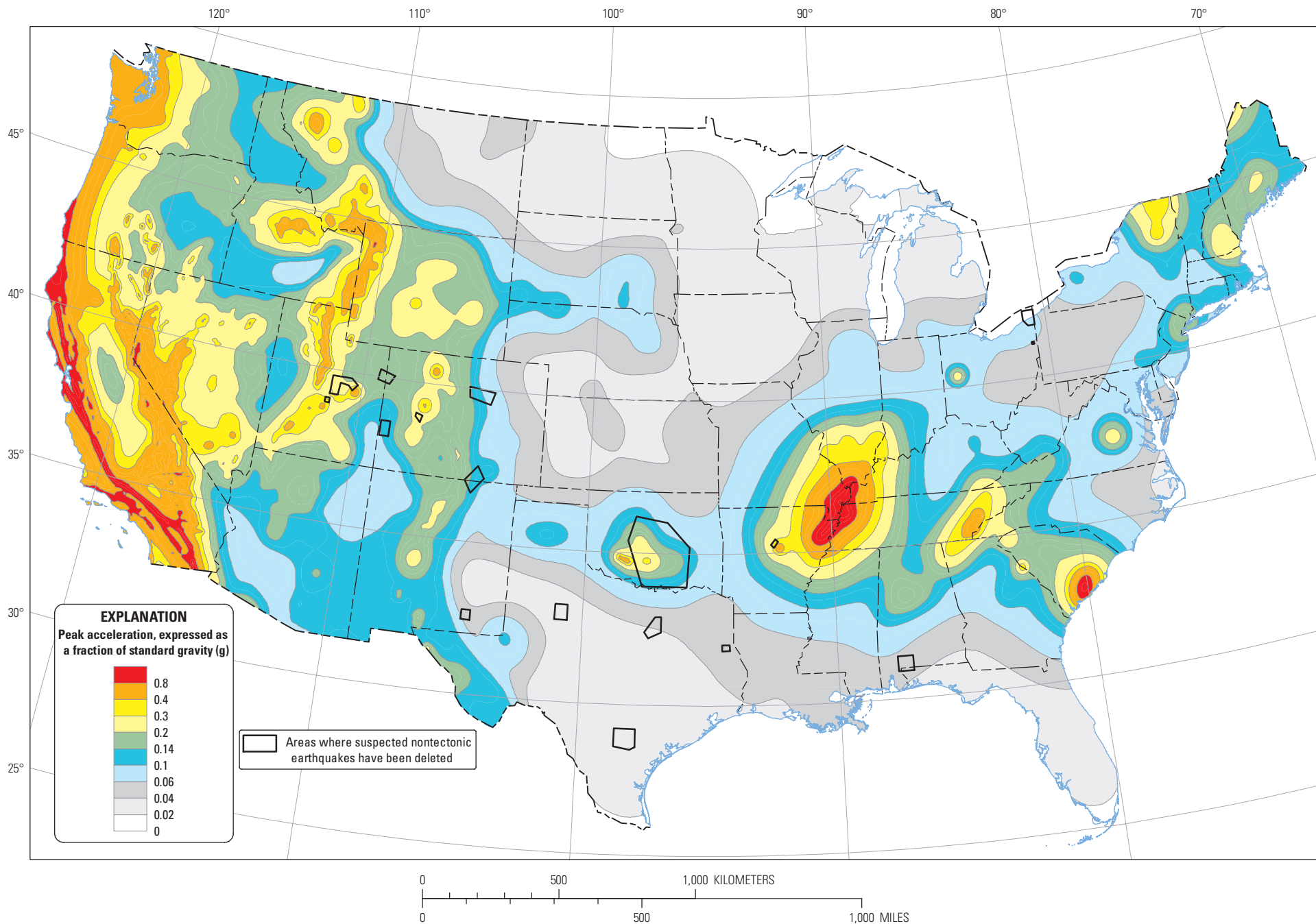
Chance of potentially minor-damage* ground shaking in 2018



* equivalent to Modified Mercalli Intensity VI, which is defined as: "Felt by all, many frightened. Some heavy furniture moved; a few instances of fallen plaster. Damage slight."

FIGURE 7

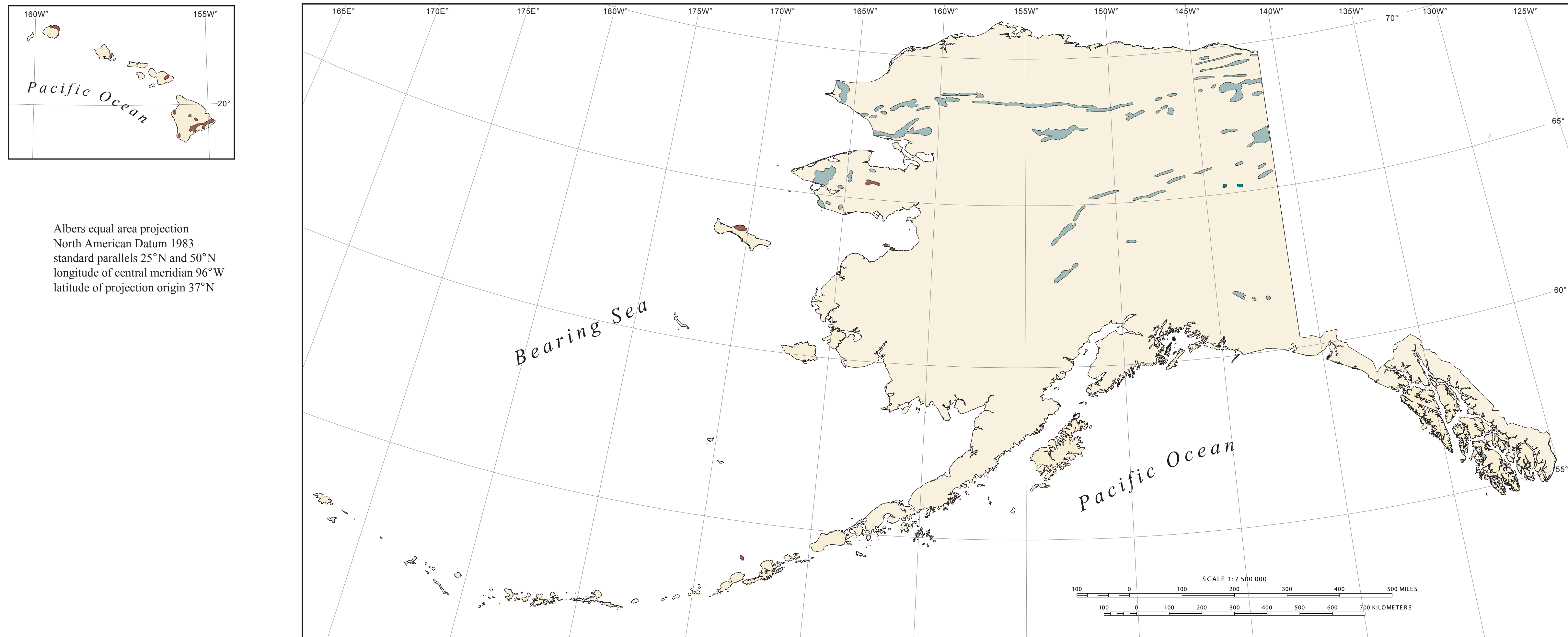
Two-percent Probability of
Exceedance in 50 Years Map or
Peak Ground Acceleration



Two-percent probability of exceedance in 50 years map of peak ground acceleration

FIGURE 8

Digital Engineering Aspects of Karst Map



U.S. Geological Survey Open-File Report 2004-1352



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