COLORADO GEOLOGICAL SURVEY

1801 Moly Road
Golden, Colorado 80401

Matthew L. Morgan
State Geologist

October 27, 2026

Kari Parsons
El Paso County Planning and Community Development
El Paso County
2880 International Circle, Suite 110
Colorado Springs, CO 80910

Location:
Portions of SE ¼ of Sec 23,
NW ¼ of Sec 25
NE ¼ of Sec 26
T16S, R65W of the 6th PM
38.6318°, -104.6327°

Subject: **Williams Creek Generating Station CSU 1041**
El Paso County, CO;
Project ID AASI261; CGS Unique No. EP-27-0025

Dear Kari,

As requested in El Paso County's October 7, 2026 email, the Colorado Geological Survey (CGS) reviewed the proposed Williams Creek Generating Station. The materials reviewed included Entech Engineering's September 23, 2026 Soils and Geology Study and appended geotechnical investigations, Kiewit's September 25, 2026 Preliminary Drainage Report, the October 2, 2026 Civil Site Exhibit, and supporting application materials.

The application proposes a nominal 400-megawatt natural gas-fired generating station on approximately 206 acres southeast of Fountain. Associated improvements include water-storage tanks, an equalization basin, solar evaporation basins serving the zero-liquid-discharge treatment system, stormwater detention, buildings, grading, and on-site utility connections.

Entech's investigation identifies native clay soils and Pierre Shale claystone, localized artificial fill, and alluvial deposits along the drainage crossing the site. The principal geotechnical concerns are soil and bedrock expansion and localized soil collapse upon wetting, differential movement, and erosion. Groundwater was measured at approximately 17.5 feet below existing ground in one boring, and Entech identifies portions of the site as potentially subject to seasonal shallow groundwater.

The investigation provides a reasonable basis for concluding that the proposed development is feasible with appropriate foundation and earthwork measures. Entech identifies mitigation options and calls for additional investigation and final recommendations before foundation design and construction. The preliminary drainage study also evaluates the tributary crossing the site and provides a concept for bypass conveyance, detention, and erosion protection.

From a geologic-hazards perspective, CGS has no objection to approval of the proposed siting under the 1041 application, provided Entech's recommendations and the following comments are addressed during final design and construction. CGS recommends that the County's final-plan review confirm

completion of the additional geotechnical investigation and incorporation of the final geotechnical and drainage recommendations before authorizing the associated grading or construction.

CGS recommends that the final geotechnical evaluation reflect the proposed facility locations, grades, and loads. For the equalization and solar evaporation basins, relevant considerations include groundwater conditions relative to excavation and basin elevations, and soil movement affecting basin support and liner integrity. CGS recommends coordination between the geotechnical and civil engineers so that the final plans incorporate the applicable recommendations, including geotechnical construction observations and testing.

Entech identifies active erosion along the tributary crossing the site, and Kiewit proposes drainageway stabilization and erosion protection. CGS recommends that the project's civil engineer address these conditions in the Final Drainage Report and associated plans, in coordination with the geotechnical engineer. The purpose of this coordination is to confirm that the proposed drainage improvements adequately protect adjacent basin embankments, fills, access, and utilities from erosion, scour, and redirected flow, without increasing hazards upstream or downstream.

CGS also recommends clarification of the application's groundwater discussion. The absence of a known aquifer does not eliminate the shallow groundwater documented by Entech or its relevance to excavation, soil behavior, and basin performance. A revised discussion could distinguish these conditions and explain how the proposed containment measures provide groundwater protection. CGS's review covers the generating station and associated improvements included in this 1041 application. The separately proposed offsite natural-gas pipeline is outside the scope of this review.

Thank you, Kari, for the opportunity to comment on this project. Please contact me at jlovekin@mines.edu with questions or to coordinate further CGS review. Applicant and consultant questions, requests for clarification, and requests for meetings with CGS should be submitted through the County's planning office. The County will coordinate these requests with CGS.

Sincerely,

Jonathan R. Lovekin, P.G.
Senior Engineering Geologist