

# Exhibit 8

## Dana Holmes

---

**From:** Ryan Clerico <Ryan.Clerico@enefitamericanoil.com>  
**Sent:** Wednesday, July 01, 2015 12:20 PM  
**To:** Michael Doyle  
**Cc:** Dana Holmes; Howard, Stephanie J  
**Subject:** Re: RFI #5 for EIS  
**Attachments:** EAO\_EIS\_Data Gap Responses070115\_FINAL.pdf

Hi Mike,

Please see attached for Enefit's responses to the requested information. Please feel free to contact me with any additional questions.

Kind regards,

Ryan

Ryan Clerico  
Head of Development and Environment  
Enefit American Oil  
Office: +1 801 363 0206  
Mobile: +1 801 703 6983  
Skype: Ryan.Clerico  
[Ryan.Clerico@enefit.com](mailto:Ryan.Clerico@enefit.com)

*CONFIDENTIALITY NOTICE: This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain proprietary, confidential and/or privileged information belonging to Enefit American Oil, Eesti Energia, and/or its affiliates. Any unauthorized review, use, disclosure or distribution is strictly prohibited. If you are not a recipient indicated or intended in this message (or responsible for delivery of this message to such person), or believe for any reason that this message may have been addressed to you in error, you may not use, copy or deliver this message to any other person or entity. In such case, you should immediately destroy this message and are respectfully requested to notify the sender by reply email.*

From: Michael Doyle <[mdoyle@epgaz.com](mailto:mdoyle@epgaz.com)>  
To: "Ryan Clerico ([ryan.clerico@enefitamericanoil.com](mailto:ryan.clerico@enefitamericanoil.com))" <[ryan.clerico@enefitamericanoil.com](mailto:ryan.clerico@enefitamericanoil.com)>  
Cc: "Howard, Stephanie J" <[showard@blm.gov](mailto:showard@blm.gov)>, Dana Holmes <[dholmes@epgaz.com](mailto:dholmes@epgaz.com)>  
Date: 06/25/2015 07:27 AM  
Subject: RFI #5 for EIS

---

Ryan –

Attached for your review and response is RFI #5. These questions and information requests stem from the BLM and Cooperating Agency review of Administrative Draft EIS #1. Please let me know if you would like to discuss these items on the phone.

Please provide responses back by July 9, 2015. Thanks.

Regards,

**Michael Doyle** AICP, PLA | Principal | 801.746.4457 O | 801.573.2563 C | 801.746.3596 F  
**epg** | 208 East 800 South, Salt Lake City, Utah 84111 | [mdoyle@epgaz.com](mailto:mdoyle@epgaz.com) | [www.epgaz.com](http://www.epgaz.com)

This email, including any attachments, is intended only for the use of the individual or entity to which it is addressed. It may contain information that is attorney

### EAO Response to Data Gaps

This document has been prepared to respond to data gaps identified by the Bureau of Land Management (BLM), Vernal Field Office regarding Enefit American Oil's (EAO) utility corridor and Dragon Road improvement right-of-way (ROW) application pertaining to the BLM's Utility Corridor Project Environmental Impact Statement (EIS). Data gaps were transmitted via email by the BLM on June 25, 2015 in filename *RFI\_5\_Enefit\_6-25-15.pdf*. Data gaps were identified both for the utility corridor portion of the application ("the Utility Corridor Project"), as well as for EAO's connected-action private land development (referred to as "the South Project"). Comments are addressed below accordingly and organized by category and data gap text from the transmitted file, followed by EAO response. It should be noted that any source documents referenced will not be reissued as subsequent revisions; rather, all responses will be directly addressed herein.

#### ***Green River Water Intake Facilities***

##### Data Gap No. 1

"It is unclear if new facilities are needed on the Green River collection point, or if the existing facilities are adequate. If new/additional/expanded capacity facilities are needed, they are a connected action that needs to be added into the project description and accounted for in the impact analysis, regardless of surface ownership. Please clarify."

EAO Response:

The existing water withdrawal facilities at Deseret Generation and Transmission's (DG&T) Green River station near Jensen, Utah consist of multiple Ranney Collector Wells (RCWs); however, these existing wells are not adequate to deliver the necessary water for the South Project. These existing RCWs and their associated filtration and pump stations are located on upland areas owned by DG&T, with perforated horizontal collector pipes extending out into the alluvium underlying the Green River. EAO would expand the existing RCW field with the addition of two to three new RCWs (final count dependent upon future test well pump yields) on adjacent private land owned by EAO, in order to deliver the 15 cubic feet per second (cfs) water right. The new RCWs and associated filtration and pumping would be located in existing fallow/disturbed upland areas and would interconnect with DG&T's existing pipeline system that feeds the Bonanza Power Plant. RCWs are a patented well system, with additional information on the design available here: <http://www.layne.com/en/solutions/construction/ranney-collector-wells.aspx>.

##### Data Gap No. 2

"Include information on whether the collector wells and direct river intakes on the Green River will be in the river alluviums or screened on the river bank. Will there be a pump and a generator?"

EAO Response:

The RCWs would be fed from perforated horizontal collection tubes installed in the river alluvium underlying the river bottom. No direct river intake and/or screening from the river bank is proposed. There would be an electric pump for each RCW, although no generators are proposed – there is

overhead electric transmission available at the well location that currently services the existing DG&T RCW system.

Data Gap No. 3

“Please identify if, when, and during which project, you previously conducted ESA Section 7 consultation regarding the water rights associated with the Project, and the amount of water previously used from this water right.”

EAO Response:

To the best of EAO’s knowledge, Endangered Species Act (ESA) Section 7 consultation has not been conducted associated with this water right. While the water right is a senior water right with a priority date of 1965, it has not put to beneficial use to date. Proof is not due to perfect the water right until 2025.

Data Gap No. 4

“If the approved water right of 15 cubic feet per second (cfs) is from the Green River, what does this equate to for total estimated annual use for the Project? Can an estimate of total water volume for the life of the Project be provided?”

EAO Response:

The total estimated annual use for the South Project, as well as an estimate of total water volume for the life of the South Project, cannot be provided at this time. EAO provided preliminary estimates of water use for the South Project in the response to data gaps dated October 10, 2014. However, those estimates were, and continue to be, preliminary and subject to change based on ongoing engineering of the South Project. Final/actual water use values will not be known until EAO completes engineering of the South Project. EAO has designed the collector well and pipeline delivery system to transport the 15 cfs available under the water right to ensure the full amount is available for the South Project if needed.

Data Gap No. 5

“Is the diversion point on BLM land? There are 26 points of diversion listed for this water right. Identify which ones are going to be used.”

EAO Response:

There are 26 points of diversion (PODs) listed for this water right, which enables EAO to select preferred PODs but also retain “backup” options as needed to ensure reliability of the water supply system. The proposed PODs to be used under the water right are those located adjacent to private land owned by EAO and/or DG&T near Jensen, Utah. It is planned that EAO would prioritize use of those PODs located adjacent to the land owned by EAO. The proposed PODs are located in the southwest quarter of Section 6, Township 6 South, Range 23 East and the northeast quarter of Section 12, Township 6 South, Range 22 East. Not all PODs in this area would ultimately be used; only those locations with adequate yield to withdraw 15 cfs from the Green River via the RCW system would be necessary. EAO estimates that up to five of the 26 PODs available under the water right, all located on the Green River, would actually be