Inadvertent Return Plan

For

Hoffman Falls Wind Project

Phase 1 Project

April 2026

Revision	Date	Pages Affected
0	02/05/26	All
1	4/24/2026	

55 East Main St., Suite 210 Johnstown, NY 12095 (518) 762-5382 www.thewessongrp.com

TABLE OF CONTENTS

1.0 Introduction

1.1 Project Information

The Hoffman Falls Wind Project (the Project) is a utility-scale wind energy generating project located in Madison County, New York with a generating capacity of up to 109.8 megawatts (MW). The Facility will include 18 wind turbines, with nine located in the Town of Fenner, one in the Town of Smithfield, one in the Town of Nelson, and seven in the Town of Eaton. This plan is meant to address construction activities occurring in the Phase 1 portion of the Project, which includes tree clearing, general civil construction (e.g., construction of access roads, laydown yards, turbine foundation and pad grading and excavation, etc.), and collection system installation. This plan may be amended at a later date to include additional construction activities if needed.

1.2 Purpose

The purpose of this Inadvertent Return Plan is as follows:

1. Minimize the potential for inadvertent returns, or "frac-outs," associated with horizontal directional drilling (HDD) activities.
2. Provide for the timely detection of inadvertent returns.
3. Protect environmentally sensitive areas.
4. Ensure an organized, timely and "minimum-impact" response in the event an inadvertent return occurs in, or threatens, an environmentally sensitive area.
5. Ensure that inadvertent returns, including spills/releases, are reported to the appropriate entities, as necessary, and that documentation is completed.
6. Provide guidance for the proper disposal of HDD drilling fluid and cuttings.

2.0 Communications Plan

Contact information for the Permittee and the Permittee's representatives, the environmental monitor (EM), and the contractor teams is provided in the approved Facilities Communications Plan. Additional contact information specifically relevant to inadvertent returns is provided in the table below.

Hoffman Falls Wind Team (the Permittee) - Construction Site Manager (CSM) / Representative	David Hurd: (405) 990-4512 / xdhu@bpp-projects.com
General Construction Contractor Team (The Wesson Group) – Project Manager (PM)	TBD
New York State Department of Public Service (NYSDPS)	Chase Chaskey: (518) 844-0454 / chase.chaskey@dps.ny.gov

New York State Department of Environmental Conservation (NYSDEC)	Region 7 Office: (315) 426-7400 Region 7 Spills Mgmt and Remediation: (315) 426-7519 Region 7 Permits: (315) 426-7438
NYS Spill Hotline	1-800-457-7362

Information on site personnel roles and responsibilities, including the stop work order process and the role of the environmental monitor can be found in the approved Environmental Monitoring Plan and Facility Communications Plan. The environmental monitor will inspect horizontal directional drilling activities daily.

3.0 General Approach and Safety Measures

Please find attached Attachment A, the Inadvertent Return Plan (IR Plan) specifically for HDD operations on site, prepared by our team to address the potential release of non-hazardous drilling fluid during our directional drilling operations and disposal of drilling fluids onsite. This plan has been developed with a strong focus on environmental safety and compliance, ensuring that all necessary measures are in place to minimize any adverse impacts on the surrounding environment.

The IR Plan outlines both preventative strategies and detailed response actions to manage any inadvertent fluid returns. These include continuous monitoring during drilling, immediate response protocols if fluid loss is detected, and specific containment and cleanup procedures tailored to various scenarios, such as releases on land, in waterways, or on roadways. The IR Plan also emphasizes the use of environmentally safe drilling fluids and proven techniques to mitigate any potential environmental risks.

The IR reflects our commitment to upholding the highest standards of safety and environmental responsibility for this Project. TWG's Environmental manager will work with all parties throughout construction of the Project for the implementation of this plan.

4.0 HDD Locations

Table 1 identifies the crossing locations, feature(s) crossed and the coordinates of all HDD locations.

TABLE 1 - HOFFMAN FALLS CROSSING SCHEDULE - GE

CROSSING ID	TYPE	HDD START COORDINATES (NORTHINGS, EASTINGS)	HDD END COORDINATES (NORTHINGS, EASTINGS)
DB1-1	UTILITY CROSSING	(1042436, 1081564)	(1042323, 1081614)
DB1-2	ROAD CROSSING	(1043459, 1081449)	(1043472, 1081376)
DB1-3	WETLAND CROSSING	(1044183, 1079539)	(1044172, 1079618)
DB1-4	ROAD CROSSING	(1044328, 1076524)	(1044295, 1076569)
DB1-5	ROAD CROSSING	(1042365, 1074978)	(1042394, 1075197)
DB1-6	WETLAND CROSSING	(1042339, 1074320)	(1042359, 1074935)
DB1-7	WETLAND CROSSING	(1042163, 1074095)	(1042268, 1074216)

DB1-8	ROAD CROSSING	(1042115, 1073750)	(1042126, 1073815)
DB1-9	ROAD CROSSING	(1041976, 1073696)	(1042042, 1073696)
DB1-10	WETLAND CROSSING	(1040864, 1073125)	(1040910, 1073227)
DB2-1	WETLAND CROSSING	(1045613, 1077366)	(1045557, 1077411)
DB2-2	WETLAND CROSSING	(1044890, 1077656)	(1044807, 1077661)
DB2-3	WETLAND CROSSING	(1044206, 1079546)	(1044195, 1079629)
DB2-4	ROAD CROSSING	(1043473, 1081452)	(1043486, 1081380)
DB2-5	UTILITY CROSSING	(1042446, 1081586)	(1042333, 1081636)
DB2-6	WETLAND CROSSING	(1046371, 1076312)	(1046417, 1076279)
DB2-7	WETLAND CROSSING	(1047577, 1075578)	(1047634, 1075578)
DB2-8	ROAD CROSSING	(1048064, 1073617)	(1048058, 1073319)
DB2-9	WETLAND CROSSING	(1048537, 1072071)	(1048823, 1072011)
DB2-10	WETLAND CROSSING	(1049483, 1072008)	(1049850, 1072068)
DB2-11	WETLAND CROSSING	(1052361, 1072372)	(1052305, 1072362)
DB2-12	WETLAND CROSSING	(1053097, 1072477)	(1053202, 1072478)
DB2-13	ROAD CROSSING	(1053298, 1072479)	(1053377, 1072479)
DB2-14	WETLAND CROSSING	(1053484, 1072479)	(1053617, 1072479)
DB2-15	WETLAND CROSSING	(1053947, 1072478)	(1054061, 1072477)
DB2-16	WETLAND CROSSING	(1056273, 1066719)	(1056481, 1067417)
DB2-17	WETLAND CROSSING	(1057971, 1068418)	(1058040, 1068324)
DB2-18	WETLAND CROSSING	(1058681, 1067429)	(1058816, 1067253)
DB2-19	ROAD CROSSING	(1060388, 1066356)	(1060799, 1066380)
DB2-20	WETLAND CROSSING	(1061600, 1066402)	(1061856, 1066419)
DB2-21	WETLAND CROSSING	(1062985, 1065396)	(1063276, 1065045)
DB2-22	WETLAND CROSSING	(1062772, 1064237)	(1062597, 1063920)
DB3-1	UTILITY CROSSING	(1042470, 1081640)	(1042358, 1081690)
DB3-2	ROAD CROSSING	(1043487, 1081453)	(1043500, 1081382)
DB3-3	WETLAND CROSSING	(1044254, 1079571)	(1044237, 1079676)
DB3-4	WETLAND CROSSING	(1044878, 1077680)	(1044795, 1077685)
DB3-5	WETLAND CROSSING	(1045626, 1077384)	(1045570, 1077429)
DB3-6	WETLAND CROSSING	(1046385, 1076331)	(1046431, 1076298)
DB3-7	WETLAND CROSSING	(1047578, 1075602)	(1047634, 1075602)
DB3-8	ROAD CROSSING	(1048084, 1073617)	(1048078, 1073318)
DB3-9	WETLAND CROSSING	(1048544, 1072095)	(1048830, 1072035)
DB3-10	WETLAND CROSSING	(1049480, 1072031)	(1049846, 1072091)
DB3-11	WETLAND CROSSING	(1052359, 1072399)	(1052303, 1072389)
DB3-12	WETLAND CROSSING	(1053097, 1072501)	(1053202, 1072502)
DB3-13	ROAD CROSSING	(1053378, 1072504)	(1053298, 1072504)
DB3-14	WETLAND CROSSING	(1053484, 1072504)	(1053618, 1072503)
DB3-15	WETLAND CROSSING	(1053946, 1072505)	(1054060, 1072505)

DB3-16	WETLAND CROSSING	(1057983, 1068427)	(1058052, 1068334)
DB3-17	WETLAND CROSSING	(1058701, 1067446)	(1058837, 1067269)
DB3-18	ROAD CROSSING	(1060385, 1066383)	(1060799, 1066409)
DB3-19	WETLAND CROSSING	(1061598, 1066427)	(1061848, 1066442)
DB3-20	WETLAND CROSSING	(1063010, 1065413)	(1063301, 1065062)
DB3-21	WETLAND CROSSING	(1064943, 1064144)	(1065005, 1064066)
DB3-22	ROAD CROSSING	(1065643, 1063992)	(1065706, 1064012)
DB3-23	WETLAND CROSSING	(1067223, 1063926)	(1069123, 1063949)
DB3-24	ROAD CROSSING	(1072291, 1064514)	(1072224, 1064510)
DB3-25	WETLAND CROSSING	(1072648, 1064999)	(1072601, 1064948)
DB3-26	WETLAND CROSSING	(1073965, 1065192)	(1073967, 1065123)
DB4-1	UTILITY CROSSING	(1042480, 1081662)	(1042368, 1081712)
DB4-2	ROAD CROSSING	(1043500, 1081456)	(1043513, 1081385)
DB4-3	WETLAND CROSSING	(1044276, 1079587)	(1044262, 1079674)
DB4-4	WETLAND CROSSING	(1044857, 1077704)	(1044774, 1077708)
DB4-5	WETLAND CROSSING	(1045641, 1077401)	(1045585, 1077446)
DB4-6	WETLAND CROSSING	(1046400, 1076351)	(1046445, 1076318)
DB4-7	WETLAND CROSSING	(1046757, 1077756)	(1046812, 1077779)

Attachment A – Inadvertent Return Plan

Overview

TWG will employ environmentally safe drilling fluids alongside established and proven drilling techniques to minimize potential adverse impacts on pipe installation and the surrounding area during directional drilling. Additionally, TWG will follow standard procedures if drilling fluid is observed to be lost from the borehole, ensuring appropriate measures are taken to re-establish circulation. TWG is committed to implementing best practices to reduce inadvertent fluid loss and safeguard against environmental impact.

Depending on ground formation porosity and permeability, a small proportion of drilling fluid (typically less than 5%) may be naturally absorbed by the substrate. Fluid lost from the borehole rarely migrates to the surface and is unlikely to encounter the ground or estuaries.

Environmental Impact

Although environmental effects from directional drilling are typically minimal, effective planning and response protocols are essential to mitigate negative consequences should inadvertent drilling fluid loss occur and migrate into sensitive areas. By utilizing environmentally responsible drilling fluids, any fluid loss is expected to result only in a temporary, minor increase in turbidity, which dissipates over time without causing lasting harm.

Potential drilling fluid products for use at the Hoffman Falls Wind project site are listed below. All products are selected for their environmentally responsible properties and their compatibility with project requirements.

Product Name	Primary Function
Sureflow Clay	Clay Stabilization
Gel-Rite	Borehole Conditioning
Sureflow Sand	Sand Control
Soda Ash	pH Adjustment
Barakade Plus High-Yield Bentonite	Borehole Stabilization
Power Pac R	Rheology Modifier
Magma Fiber	Loss Control Material
Clay Cutter	Clay Inhibition
Hydraul-EZ	Flow Enhancement
REL-PAC	Fluid Loss Reduction
Super PAC	Filtration Control
Suspend IT	Suspension Aid
Macro Fill	Absorbent Material
Approved Equal	As Applicable

All listed products, or approved equivalents, may be used in accordance with manufacturer guidelines and environmental best practices to ensure minimal impact on the surrounding environment during HDD operations.

On-Site Equipment

The following equipment will be on-site during HDD to contain an inadvertent return. Also, for all HDD projects, the SDS for the fluid being used must be on-site.

- Track excavators
- Leak free portable pumps
- Sandbags
- Plastic sheeting
- 55-gallon drums with bottoms cut out
- Spill kits
- Leak-free hoses
- Vacuum truck/trailer or reclaimer[1]
- Underwater boom and curtain, if needed
- Filter sock, sediment fencing, and other E&SC practices approved in the SWPPP

Contingency Response Plan

While the exact nature of drilling fluid loss is unpredictable, reliable monitoring is achievable by comparing the rate of fluid pumped down-hole with that returning to the surface. This monitoring is conducted continuously by the driller throughout the operation.

The Wesson Group and its drilling contractor will be directed to implement the following measures if an inadvertent return or frac- out occurs during HDD:

Once a Frac-out is Identified:

- The Contractor shall stop all work, including the recycling of drilling mud/lubricant. The pressure of water above the pipe keeps excess mud from escaping through the fracture.
- Determine the location and extent of the frac-out and initiate containment (see sections below for specific protocols).
- Immediately notify The Wesson Group's PM, or lead superintendent, who must notify the Permittee's CSM and the EM.
- The Permittee's CSM will contact the applicable agency and landowner representatives.

If the Frac-out is in an Upland Area:

[1] The vacuum truck will be staged within or immediately adjacent to the Facility Site whenever directional drilling is being performed in sensitive areas. When drilling is being performed within upland areas, the vacuum truck will be staged within a 15-minute drive of the drilling site.

- It is anticipated that the following response procedures will generally be followed. However, these may be modified, as appropriate, based on consultation with the EM and applicable agency representatives:
    - The Contractor shall surround the area with sandbags, earthen berms, or sediment fencing to contain the drilling mud.
    - If the amount of drilling fluids released allows for collection, excavate a sump pit and establish a means to return the fluid to the drilling operation or to an approved disposal location on site or use a mobile vacuum truck to pump the drilling mud from the contained area and recycle it.
    - If the amount of drilling fluids released is not enough to allow practical collection, dilute the affected area with freshwater and allow it to dry and dissipate naturally.
    - If the amount of surface return exceeds that which can be collected using small pumps, suspend drilling operations until surface volumes can be brought under control.
    - Once the drilling fluid is contained, drilling may resume.
    - If this is a leased property, the Permittee's CSM or Environmental Compliance Manager (ECM) will contact the landowner if corrective actions are needed.
- If the frac out is within or immediately adjacent to a roadway, coordinate with the Permittee's CSM, the Wesson Group's PM, and the EM to ensure any additional necessary parties are notified (e.g., law enforcement) and potential traffic disruptions are properly managed.

If Frac-out is in a Wetland or Water Body:

- The Contractor must isolate the area with silt fences, sandbags, plywood coffers, and/or isolation/containment environment (underwater boom and curtain), as needed to contain the drilling fluids.
- Immediately notify The Wesson Group's PM, who must notify the Permittee's CSM and EM.
- If necessary, the Permittee's CSM will notify NYSDPS and NYSDEC contacts as soon as possible. This notification will include the following information: the time and location of the occurrence, the type of material and the estimated volume released, the corrective measures being implemented, and an estimated timeline in which corrective actions will be implemented to address the release. The Permittee's representatives will also consult with the landowner, as appropriate.
- Within 24 hours of the frac-out, the following information will be provided by the Permittee's CSM to the NYSDPS, and NYSDEC in accordance with applicable regulations and reporting requirements: a USGS location map depicting the inadvertent return location, a description of the regulated water of the U.S. (type, quality, extent of watershed potentially affected), a characterization of the extent of the resource directly affected, report corrective actions already taken, photographs of the

affected area, and an identification of any known NYSDPS, NYSDEC, or other authorizations needed to perform corrective actions.

- Within 48 hours, a monitoring report summarizing the location of surface returns, estimated quantity of fluids, and a summary of cleanup efforts, as applicable, will be developed by the EM and submitted by the Permittee's CSM to NYSDEC and NYSDPS.
- Drilling operations must be suspended if surface returns are uncontained and pose a threat to the resource or to public health and safety. Drilling operations may resume once surface returns are contained and all resource and public health and safety concerns have been resolved. The Wesson Group's PM will provide the information to the Permittee's CSM and EM to assess whether the frac-out must be reported to the NYSDEC Spill Hotline or other State or federal agencies.
- The Contractor will monitor frac-out for 4 hours to determine if the drilling mud congeals. Bentonite will usually harden, effectively sealing the frac-out location.
    - If drilling mud congeals, take no other action that would potentially suspend sediments in the water column.
    - If drilling mud does not congeal, attempt sealing or plugging of the frac-out pathway from the bore to the soil surface by adding appropriate "lost circulation materials" to the existing drilling fluids slurry.
        - Use approved hardeners to solidify bentonite that does not congeal.
        - Use "lost circulation materials" that are specified for HDD applications. Lost circulation materials will be inorganic so as to not create an environment conducive for bacterial growth. These materials function by plugging, bridging, or swelling in place.
        - The appropriate concentrations of this material will be added, based upon guidelines from its product data sheets, and/or from a qualified drilling fluids manufacturer representative's recommendations.
        - If the fracture becomes excessively large,[2] a spill response team would be called in to contain and clean up excess drilling mud in the water. Phone numbers of spill response teams in the area will be on site.
    - The Permittee's CSM and EM will consult with the NYSDPS, and NYSDEC in developing any required frac-out restoration plans.
        - The Contractor will implement any agency required frac-out restoration plans.
        - Removal of released fluids from environmentally sensitive areas may cause additional adverse impacts to the resource. Prior to the removal of fluids from

[2] The HDD's proposed by the Applicant across the Project site vary in their scope. An "excessively large" inadvertent return (IR) is one that cannot be managed with the equipment, materials, and personnel deployed to a specific Horizontal Directional Drilling (HDD) operation. This definition is site dependent.

environmentally sensitive areas, NYSDPS and NYSDEC staff will be notified and consulted.

If Frac-out is in an Inaccessible and/or Sensitive Area:

- If inadvertent fluid returns emerge in inaccessible and/or sensitive area, follow all applicable notification procedures identified above.
- Confirm all feasible technical measures have been exhausted to re-establish circulation.
- Seek further consultation from the respective permitting authorities and safety representatives.
- If it has been determined that attempting to access the frac out would result in impacts to the resources that would exceed the impacts of the frac out itself, or if access would pose health and safety concerns for site personnel (e.g., due to extremely steep slopes), proceed with drilling using the minimum quantity of fluid necessary to penetrate the formation and complete product line installation.
- Coordinate regularly with the Permittee's CSM, the Wesson's Group's PM, the EM, and applicable agency staff as the boring continues and is completed to reevaluate site conditions and impacts.

After the frac-out is stabilized and any required removal is completed, The Wesson Group and any of their drilling sub-contractors will make every effort to determine the cause of the frac-out and will implement any modifications needed to minimize or prevent further releases. The drilling contractor will document post-cleanup conditions with photographs and prepare a frac-out incident report describing time, place, actions taken to remediate frac-out and measures implemented to prevent recurrence.

Incident reports will be provided by the Permittee's CSM or EM to the NYSDPS and any appropriate agencies as part of Project compliance not more than 30 days after the incident.

Restoration

Clean-up and restoration will be initiated immediately following containment of the IR and in coordination with the applicable agencies, as needed, The released drilling fluids will be contained and recovered using vacuum trucks, pumps, and other manual methods. The affected area will be stabilized through the installation of appropriate erosion and sediment controls, and impacted surfaces will be restored to pre-construction conditions and/or in accordance with the approved SWPPP and design drawings for the Facility.

Disposal

All residual directional drill material must be disposed of at a properly certified facility or location duly authorized to receive such material in accordance with all applicable laws and regulations. The Wesson Group will collect composite sample(s) of the drilling fluids/waste collected for analytical testing and in accordance with the approved disposal facility testing requirements.

Testing Requirements

All material samples in the pit must be analyzed for the full suite of target analyte list (TAL) metals; target compound list plus 30 (TCL + 30) organic compounds, including volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and 1,4-dioxane; and per- and polyfluoroalkyl substances (PFAS). Please refer to Table 1 of NYCRR 360.13(e)(1) for sample number frequency.

- TAL refers to the list of inorganic compounds/elements designated for analysis as contained in the version of the EPA Contract Laboratory Program Statement of Work for Inorganics Analysis, Multi-Media, Multi-Concentration in effect as of the date on which the laboratory is performing the analysis.

- TCL+30 is the list of organic compounds designated for analysis (TCL) as contained in the version of the EPA Contract Laboratory Program Statement of Work for Organics Analysis, Multi-Media, Multi-Concentration in effect as of the date on which the laboratory is performing the analysis, and up to 30 non-targeted organic compounds (plus 30) as detected by gas chromatography/ mass spectroscopy (GC/MS) analysis.

- All PFAS samples must be collected in accordance with the sampling protocols outlined in Appendix B of the NYSDEC document, "Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances under NYSDEC's Part 375 Remedial Programs" (https://www.dec.ny.gov/docs/remediation_hudson_pdf/pfassampanaly.pdf). The required testing method for PFAS is Draft EPA Method 1633 unless an alternative method is approved by NYSDEC. The samples must be analyzed for all the PFAS compounds provided by the test method.

If the drilling fluids pass the analytical testing, drilling fluid will be disposed of at an approved and permitted disposal facility, upon approval from the Permittee's CSM, NYSDEC, and NYSDPS. If drilling fluid is found to be impacted/contaminated, the contractor will notify the Permittee's CSM of an appropriate facility to accept the material, permit status, and waste manifest requirements to receive approval from the NYSDEC and/or NYSDPS prior to removal and disposal of the material offsite. If additional disposal sites are needed, minor modification will be sought to obtain approval by ORES.

NYSDEC Requirements to Determine Env. Impacts (Total concentration)	Testing Requirements Required by the Landfill (TCLP)
TAL Metals	Pesticides/Herbicides (TCLP)
VOCs	Ignitibility / Corrosivity / Reactivity
SVOCs	TAL Metals (TCLP)
PCBs	VOCs (TCLP)
1,4 dioxane	SVOCs (TCLP)
PFAS	PCBs (TCLP)