
DECOMMISSIONING PLAN

FOR

Ball Hill Wind Project

Chautauqua County, New York

Owner/Operator:

Northland Power Development Services, Inc.

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Prepared By:



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I. EXECUTIVE SUMMARY

Northland Power Development Services, Inc. (NPI) retained Fisher Associates to prepare this Decommissioning Plan (the Plan) to outline the methods and means to decommission the Ball Hill Wind Farm Project (the Project) at the end of the Project's useful life and to restore the Project site.¹ The purpose of the Plan is to identify the methodologies to be utilized to mitigate potential impacts resulting from the decommissioning process. All decommissioning and restoration activities will adhere to the requirements of appropriate governing authorities and will be in accordance with all applicable federal, state, and local permits and decommissioning agreements. The Applicant will obtain any federal, state, or local permits required for site decommissioning and restoration prior to the commencement of the decommissioning process.

The Project is anticipated to have a lifespan of between 25-40 years. At the end of its life, the Project will be decommissioned, and its wind turbines, ancillary equipment, buildings, and infrastructure will be removed as described below. Decommissioning of a turbine will be required if the turbine has not generated electricity for a period of 12 continuous months unless the 12-month period of no energy output is the result of (a) a repair, restoration, or improvement to an integral part of the Project that affects the generation of electricity and repair, restoration or improvement is being diligently pursued by the Applicant, or (b) a Force Majeure event. Force majeure includes, but is not limited to, causes or events beyond the reasonable control of, and without the fault or negligence of the party claiming Force Majeure, including acts of God, sudden actions of the elements such as floods, earthquakes, hurricanes, or tornados; sabotage; terrorism; war; riots; explosion; blockades; pandemic; and insurrection. The requirement to decommission the turbine and other Facility components that solely serve that turbine will be triggered unless otherwise agreed to with the Towns, County, and New York State Department of Public Service (DPS) or unless the Applicant demonstrates to the Towns and County staff that it has been making good faith efforts to restore the turbine to an operable condition.

Generally speaking, the decommissioning activities will occur in the following order:

- Dismantling of wind turbines, including the blades, nacelle, and tower;
- Removal of the electrical system, collection substation, and substation control building;
- Removal of wind turbine pads and foundations;
- Removal of access/service roads (unless the landowner asks that the roads be left in place); and
- Site reclamation.

Before commencing decommissioning, the Project will be shut down, de-energized, and disconnected from the regional transmission system at the Project interconnection switching station. The Applicant will coordinate de-energization with National Grid to ensure no disruption to the overall electrical system. Additionally, the Applicant will give landowners, the towns of

¹ Going forward, all discussions of decommissioning refer to decommissioning at the end of the Project's useful life.

Hanover and Villanova, and the county at least six weeks advance notice prior to commencing the decommissioning activity.

All aboveground components including buildings, structures and equipment will be removed during decommissioning except as otherwise specified below. In addition, all foundations will be removed to a depth of at least three feet below ground surface (bgs) in non-agricultural areas and at least four feet bgs in agricultural areas, unless otherwise required by landowner agreements. After removal of the foundation to the depth specified, it will then be backfilled, covered with imported topsoil, and reseeded. Based on discussions with landowners, access roads will either be left in place or removed, and the disturbed land areas will subsequently be graded (adding imported topsoil as necessary to ensure drainage) and reseeded as laid out in this Plan.

The wind turbines, including towers, will be dismantled and either reused at other wind energy facilities, recycled as scrap metal, or transported to an approved facility for disposal. Concrete pads and foundations can be fragmented and crushed into aggregate for potential reuse as road-based material. After fluid removal, transformers and electrical control devices will be reused at other facilities or recycled as scrap metal, while electrical equipment will either be recycled or transported to an approved facility for disposal. Underground electrical and fiber optic control cables will be de-energized, and cables installed at depths greater than three feet bgs (four feet in agricultural areas) will be left in-place at the site.

The goal of decommissioning is the safe and efficient removal of all wind energy facility components and reclamation of the site to conditions as close to pre-construction characteristics as possible, including restoration of native vegetation, habitat and/or land use. The same safety protocols used during construction will be used during decommissioning.

The decommissioning process is expected to take approximately 8 to 10 months. This time includes the two-week site mobilization and preparation, a 10 to 12 week period to disassemble wind turbines; an additional eight weeks to remove and reclaim turbine foundations and access roads; and two weeks to remove and reclaim the project laydown areas. During disassembly and removal and for up to four weeks thereafter, reclamation work, including grading, backfilling, erosion control activity, reseeding, and revegetation, will take place. Reclamation monitoring will be conducted for several months thereafter, and additional restoration work will be implemented on an "as needed" basis.

II. REMOVAL OF FACILITIES

A. Wind Turbines

Turbine disassembly will be accomplished using large cranes similar to those used for installation. Components will be removed in reverse order of installation; blades and rotor hub first, followed by the nacelle and ending with the turbine tower sections. The components will be loaded either directly onto trucks for removal from the Project site or placed onto the ground near the turbine base for eventual loading onto trucks.

If the wind turbine components cannot be reused on another project, they will be disassembled and sold for scrap. A scrap company will strip down the hub, blades, and nacelle to break down and remove any high-value components. The cabling internal to the towers will be removed and scrapped to recover the copper conductor materials. Tower sections will be removed and cut into transportable sections for delivery to a scrap metal purchaser. Control cabinets in the base will be stripped of high-value components, and the balance will be turned over to a scrap company for hauling and disposal. Motor oil or lubricants will be removed and disposed of according to applicable standards. Any hazardous materials will be disposed of in accordance with all applicable federal, state, and local standards. See Section E below for a discussion of procedures for removing the turbine foundations.

B. Electrical Collection System

The electrical collection system includes underground collection cabling between the wind turbines and the collector substation.

Underground cabling utilized in the collection system is installed at least three feet below grade. All collection cables less than four feet deep in agricultural areas, as identified in the as-built drawings, will be removed. In all other areas, cables less than three feet deep will be removed. During the lifespan of the Project, changes to the topography due to soil erosion, washout, or construction may reduce the cover to less than 4' from the surface at some sections; such sections will not be removed. The design documents, informed by the construction record, will be used to determine which cables are to be removed during decommissioning. The cables contain no materials that are harmful to the environment.

The underground cable installation includes a warning tape and tracer cable to alert anyone digging in the vicinity of the cables. The Project has recorded wind farm easements for all the collection/transmission facilities in the Project area. This data will be available for future landowner's reference. In addition, if requested, the company will provide the landowner with information about the location of remaining underground collection lines on their property after decommissioning occurs. The tape and cable contain no materials that are harmful to the environment and will be left in place.

When underground cables are required to be removed, a trench above the cable will be excavated

to expose it. The cable will then be cut and loaded onto trucks for removal from the site and salvaged. The trench will be backfilled with native soil and restored as laid out in this Plan. Any existing drain tiles damaged during the removal of the collection lines will be repaired. All holes left by pole and/or foundation removal will be backfilled with native soil and restored as laid out in this Plan. For this estimate, it is assumed an average of 100 feet of collection line per turbine will need to be removed. The remaining collection system is buried 3' or more.

C. Electrical Transmission System

The electrical transmission system includes poles, guy wires, foundations for poles, and overhead cabling. All cabling will be removed and scrapped. All poles will be removed, and any having a foundation associated with them will have the foundation removed to a minimum depth of four feet unless otherwise required by landowner agreements.

D. Junction Boxes

Junction box removal will consist of disconnecting the junction box from the electrical system. All high-value sellable components, such as the copper conductor materials, will be removed, and the remaining cables, equipment, and other components will be disposed or salvaged for scrap value.

After the removal of the junction boxes, the remaining concrete pad will be pulverized, removed, and recycled or disposed of at an appropriate facility. The area will then be restored to pre-existing conditions and contours consistent with this Plan.

E. Collector Substation and Operations and Maintenance (O&M) Building

Disassembly of the collector substation will include the removal of the steel, transformers, switches, conductors, and other equipment/structures that could be reconditioned and reused or sold as scrap. All underground electrical collector cables coming to the substation from the surrounding wind turbines will be cut at the perimeter of the substation, with any cables less than four feet deep removed in accordance with the procedures set forth in Section B above. Any hazardous material, such as oil or lubricants, will be removed and disposed of in accordance with applicable Federal, State, and local requirements. All concrete foundations will be removed to a minimum depth of four feet, and the concrete recycling and holes will be backfilled similarly to the turbine foundations (see Section F below for details).

The control building at the substation will be disassembled and removed from the Facility site, and its foundations will be removed to a minimum depth of four feet and recycled. The area will be backfilled similar to the turbine foundation (see Section E below). Fencing around the substation will be broken down and removed. Any concrete foundations for the fencing will also be removed to a minimum depth of four feet and recycled. The gravel or aggregate surface at the substation will be loaded onto trucks and removed for sale, reuse or disposal.

The O&M building will be removed, relocated, or sold with the land. All equipment, furniture, and materials within the O&M building will be removed prior to any other action. If the O&M building is removed, the foundation will also be removed, consistent with the methods for the wind turbines, and the concrete will be recycled. Fencing around the O&M facility will be broken down and removed. The gravel from any outdoor storage area or parking area at the O&M building will also be removed and will be sold and reused or disposed of. Upon completion of the removal of the O&M building, the site will be restored consistent with this Plan. If the building is sold with the land, the structure, fence, and gravel will remain in place as requested by the purchaser.

Any equipment necessary for the interconnection will be turned over to the Local Utility Company at facility completion and is not a part of this decommissioning study.

F. Foundations

Once the turbines and substation are removed, excavation around the foundations to expose the concrete will be accomplished using traditional excavation equipment. The foundations will be excavated to a depth sufficient to ensure complete removal of the anchor bolts, rebar, conduits, cable, and concrete to a depth of at least three feet bgs in non-agricultural areas and four feet in agricultural areas unless otherwise required by the landowner agreements. The concrete will be recycled or disposed of at an appropriate facility. After the removal of that portion of the foundation, the area will be filled with clean, compatible fill compacted to a density similar to the surrounding in-situ material. All disturbed areas will receive imported topsoil and be restored to pre-existing conditions and contours consistent with this Plan.

G. Access Roads

To perform the decommissioning activities, it may be necessary to temporarily return some access roads to the geometry and width used during the construction stage. This allows for more efficient crane access to the turbine sites and facilitates the removal of the wind turbine components by the proper-sized vehicle. Trees above the access roads may be trimmed during the decommissioning process, and the access roads may be temporarily improved to allow access, including clearing, compacting, and grading.

Once decommissioning has been completed, temporary improvements will be removed and reclaimed unless the landowner requests otherwise. Similarly, turbine access roads will be removed unless the landowner requests they remain in place. Removal of turbine access roads includes removal of gravel or aggregate and geotextile fabric as well as any culverts that are no longer necessary, followed by de-compaction of the road subgrade and shoulder. The area will then be backfilled with clean, compatible fill compacted to a density similar to the surrounding in-situ material, and the area will be graded to restore pre-construction drainage patterns. All disturbed areas will be restored in accordance with this plan.

H. Met Towers

The met towers for the Project will be removed similarly to the turbines. The met tower parts will be loaded either directly onto trucks for removal from the project site or placed on the ground near the turbine base for eventual loading onto trucks.

If the met towers cannot be reused on another project, they will be disassembled and sold for scrap. The met towers will be stripped down by a scrap company to remove any high value components. The cabling internal to the towers will be removed and scrapped to recover the copper conductor materials. Tower sections will be removed and cut into transportable sections for delivery to a scrap metal purchaser. Instrumentation will be stripped off the towers and reused, refurbished, or disposed of. The foundation will be removed to a minimum depth of three feet in non-agricultural areas, four feet in agricultural areas, and the concrete recycled. The areas will then be graded and restored in accordance with this Plan.

I. Temporary Decommissioning Facilities

As with construction, it may be necessary to establish temporary facilities to facilitate Project decommissioning. The personnel involved in the decommissioning of the Project will require temporary office space, equipment, and material storage. The O&M building and yard will serve as the decommissioning contractor's staging area until the O&M building needs to be removed. During the O&M building decommissioning, a small trailer complex will need to be established, similar to those used during the construction phase. These temporary facilities will include standard furnishings, including office sections, bathrooms, air conditioning, and potable water. Temporary parking will be provided along with appropriate security during standard non-working hours.

J. Temporary Improvements on Public Roads

Temporary improvements where the access roads meet the public roads may need to be installed to facilitate truck movements. These improvements will be removed after decommissioning is completed and the areas restored in accordance with this Plan.

A survey will be conducted of the public (Town and County) roads to be used for hauling activities in accordance with the Road Use Agreement to determine the condition of the roads prior to the start of decommissioning activities. Upon completion of the decommissioning work, the roads will be surveyed again to document any damage to the roads.

III. SITE RESTORATION

A. Reseeding, Revegetation, Backfilling, and Grading

Site restoration activities will be ongoing as the decommissioning activities are completed. This work includes reseeded and revegetation using native seed mixes in non-agricultural areas. In agricultural areas, site restoration will be coordinated with the landowner to allow desired crops to be replanted. To the fullest extent possible, topsoil will be removed and stockpiled separately from other materials near the area it was salvaged from. The salvaged topsoil will be protected from erosion per current state standards. In areas where the wind farm infrastructure or decommissioning activities have compacted the topsoil surface, the soil will be de-compacted to match the density and consistency of the surrounding area. Salvaged topsoil will be placed in the disturbed areas to its original depth, if possible, but to a minimum depth of four inches. Final grading of the topsoil will be performed to re-establish the predevelopment surface contours and conditions where possible. Stabilization measures will be implemented in disturbed areas to control erosion and sedimentation during the reclamation of the site.

To prevent the introduction of undesirable plant species into reclaimed areas and ensure slope stability, seeding and site reclamation efforts will utilize seeds for grasses native to the area and free of noxious weeds. If mulch is used, the mulch will be certified weed-free prior to use in reclamation efforts. Seed mixtures may be selected in consultation with the New York State Department of Agriculture (NYSDAM) for use during the reclamation of agricultural areas.

The topsoil in disturbed soil surfaces within agricultural fields will be de-compacted and restored to a density and depth consistent with the surrounding fields or to a depth of 18 inches. The seed mix will be agreed upon with the landowner in order to maintain consistency with the surrounding agricultural uses. All other disturbed areas will be restored to a condition reasonably similar to the original conditions using native seed mixes. In all areas, the restoration will include leveling, terracing, mulching, and other necessary steps to prevent soil erosion, ensure the establishment of suitable plants, and control noxious weeds and pests. Reseeding or soil decompaction will occur on all disturbed surfaces per landowner preference, and in accordance with site stabilization requirements that may be outlined in any permits or stormwater plans. Appropriate restoration methods and best management practices (BMPs) to minimize wind and water erosion will be implemented to maximize revegetation success.

Additional measures may be taken to reduce soil movement or erosion in areas with steeper slopes. These measures may include placing the topsoil in a roughened condition to prevent erosion, scarification, tilling, or harrowing of the area to a depth of approximately three to four inches below the ground surface to create a suitable seedbed or dozer-tracked perpendicular to the slope to provide suitable areas for seed germination.

Grading activities will be limited to the minimal area required to complete site restoration of disturbed areas using standard construction earth-moving equipment. Disturbed areas will be

graded and contoured to restore the predevelopment topography and drainage of the site.

B. Erosion Control and Storm Water Management

Erosion control and stormwater management during site reclamation will utilize measures and BMPs similar to those outlined in the Project's Stormwater Pollution Prevention Plan (SWPPP). These measures/BMPs will conform to the New York State Standards and Specifications for Erosion and Sediment Control in order to maintain downstream water quality and manage stormwater runoff during decommissioning of the Project. Selection and design of erosion and sedimentation controls will account for climate, topography, soils, and vegetative cover to be re-established at the site following decommissioning.

Silt fencing, straw bales, or other similar stormwater structures will be installed as needed to control soil erosion and sedimentation while re-establishing vegetation in seeded areas. Reclamation will likely include the installation of stormwater control structures (e.g., berms, hay bales, mulch) to prevent soil erosion and/or sedimentation during the seeding and re-establishment of native plants at the Project site.

Upon completion of restoration and reclamation activities, any silt fences or barriers used to facilitate reseeding will be removed when no longer needed for erosion and sediment control. To the maximum extent possible, native plants will be utilized to stabilize disturbed areas and control stormwater runoff during site reclamation.

Erosion controls are the primary method for preventing impacts on stormwater runoff quality, while sediment controls provide a secondary method of protection to erosion controls by facilitating the containment of any sediment in stormwater runoff. Commonly used BMPs that may be employed at the site during reclamation include:

- Minimize disturbed areas and protect natural features of the site (native soil, topsoil, vegetation, topography, and drainage areas);
- Control stormwater runoff and flow to and from disturbed areas;
- Stabilize soils as quickly as possible following disturbance of work areas;
- Protect slopes and exposed soil;
- Protect culvert inlets, drainage structures, and nearby surface water features;
- Establish perimeter controls around disturbed areas;
- Retain sediment to prevent transport off-site in stormwater runoff; and
- Maintain controls, including removal of accumulated sediment during re-establishment of vegetation.

C. Debris, Waste Management, and Cleanup

Following cleanup and seeding, vegetative debris (woody and non-woody) will be reused as

mulch over reclaimed areas.

Solid and industrial waste may result from dismantling the wind energy equipment and structures. Trash containers and regular site cleanup will be provided for proper disposal of solid waste during decommissioning and site reclamation. Trash and bulk waste collection areas with containers will be designated at the site, and materials will be recycled when possible. Litter and assorted trash will be removed daily from decommissioning areas and placed in designated trash containers for disposal. Trash, debris, and any other solid waste generated during decommissioning will be minimized and managed in accordance with applicable regulations and routinely removed from the site as needed. Any fluids generated during the decommissioning requiring disposal will be collected in appropriate containers and transported to an approved reclamation facility.

D. Reclamation Monitoring

Following completion of site reclamation, routine monitoring will be implemented at the site to ensure that native vegetation, habitats and/or land use are re-established in the areas disturbed during the decommissioning of the Project and that the site has successfully been restored to pre-construction conditions.

Reseeded areas will be routinely monitored and inspected to ensure stormwater controls remain effective while vegetation is re-established for slope stability and erosion control. Once vegetation is established, any silt fences or barriers used to facilitate the process that are no longer needed will be removed.

Invasive species and noxious weeds will be managed during site reclamation to control their spread and prevent their establishment in reclaimed areas. Routine monitoring and control of weeds will be implemented at the site following the completion of decommissioning activities. Vegetation control may include manual, mechanical, biological, or chemical treatment methods. If herbicides are deemed necessary, their application and use will comply with applicable Federal, State, and County guidelines.

IV. Decommissioning Costs

The Project consists of a total of 25 wind turbine generators (WTG), an interconnection switchyard and substation, an Operations and Management Building (O&M Building), two (2) meteorological (met) towers, underground collection lines, and approximately 13-miles of gravel surfaced access roads within leased areas on privately owned properties. There are 22 Vestas V150 4.2 Megawatt (MW) WTGs on 150-meter towers in the Town of Villenova and three (3) Vestas V136 3.45 MW WTGs on 82-meter in the Town of Hanover. The estimated cost of decommissioning is similar for both turbine models and tower heights.

The costs provided are a high-level estimate based on recently approved projects, RSMeans data, information from salvage websites, the lowest 5-year price for iron and steel scrap from USGS mineral commodity summaries, and the general construction cost from the New York State Department of Transportation (NYSDOT) website. As it is assumed that labor and mobilization costs between construction and decommissioning activities have strong similarities, current construction costs have also been considered in preparing this estimate. Note that salvage costs have not been included in this study.

A. Turbine Decommissioning Cost

The current cost of decommissioning these turbines is estimated to be approximately \$132,400 per turbine. Total turbine cost is the addition of disassembly, removal, and disposal of the turbines and foundations.

Table 4.A.1 Turbine Disassembly Costs

Cost Item	Costs per WTG (\$)
Hub and Blades	\$ 16,800.00
Nacelle	\$ 16,800.00
Tower Sections	\$ 36,000.00
Remove Turbine Foundation	\$ 3,000.00
Total Per WTG	\$ 72,600.00
Total Project (25 WTGs)	\$ 1,815,000.00

Table 4.A.2 Turbine Removal Cost

Cost Item	Costs per WTG (\$)
Blades	\$ 4,500.00
Hub	\$ 9,000.00
Nacelle	\$ 9,000.00
Tower Sections	\$ 31,500.00
Internals, Transformer	\$ 900.00
Foundation (50 Cu. Yd.)	\$ 1,000.00
Total Per WTG	\$ 55,900.00
Total Project (25 WTGs)	\$ 1,397,500.00

Table 4.A.3 Turbine Disposal Cost

Cost Item	Costs per WTG (\$)
Blades	\$ 2,040.00
Nacelle/Hub	\$ 660.00
Foundation (Recycle) (50 Cu. Yd.)	\$ 1,200.00
Total Per WTG	\$ 3,900.00
Total Project (25 WTGs)	\$ 97,500.00

Table 4.A.4 Turbine Total Cost

Cost Item	Costs per WTG (\$)
Turbine Disassembly Costs	\$ 72,600.00
Turbine Removal Cost	\$ 55,900.00
Turbine Disposal Cost	\$ 3,900.00
Total Per WTG	\$ 132,400.00
Total Project (25 WTGs)	\$ 3,310,000.00

B. Balance of Plant (BOP) Cost

The total cost of balance of plant (BOP) decommissioning is estimated to be \$1,075,800 and includes all costs except for the turbine costs discussed above. The estimated decommissioning costs for the BOP, including collection line, substation, overhead transmission line, and O&M building, plus reclamation activities for the entire Project.

For this estimate, it is assumed that a maximum of 100 feet of collection lines per turbine will be removed, as most collection lines will be installed deeper than 4 feet.

Table 4.B.1 Electrical Collection and Transmission Systems

Cost Item	Costs (\$)
Disassembly Costs	\$ 25,000.00
Removal Cost	\$ 750.00
Disposal Cost	\$ 1,250.00
Total Project	\$ 27,000.00

Table 4.B.2 Collector Substation

Cost Item	Costs (\$)
Disassembly Costs	\$ 150,000.00
Removal Cost	\$ 100,000.00
Disposal Cost	\$ 25,000.00
Total Project	\$ 275,000.00

Table 4.B.3 Access roads

Cost Item	Costs (\$)
Disassembly Costs	\$ 100,000.00
Removal Cost	\$ 115,000.00
Disposal Cost	\$ 250,000.00
Total Project	\$ 465,000.00

Table 4.B.4 Met Tower

Cost Item	Costs (\$)
Disassembly Costs	\$ 10,000.00
Removal Cost	\$ 2,500.00
Disposal Cost	\$ 1,300.00
Total Project	\$ 13,800.00

Table 4.B.5 Mobilization and Other Site Restoration

Cost Item	Costs (\$)
Mobilization	\$ 200,000.00
Backfill, Grading, Erosion Control	\$ 85,000.00
Reseeding, Revegetation	\$ 10,000.00
Total Project	\$ 295,000.00

Table 4.B.6 Project BOP Total Cost

Cost Item	Costs (\$)
Electrical Collection and Transmission Systems	\$ 27,000.00
Collector Substation	\$ 275,000.00
Access roads	\$ 465,000.00
Met Tower	\$ 13,800.00
Mobilization and Other Site Restoration	\$ 295,000.00
Total Project	\$ 1,075,800.00

* It is assumed a maximum of 100 feet of collection lines per turbine will be removed, as most collection lines will be installed deeper than 4 feet

**It is assumed the O&M building will be reused and not demolished, but if no future use is found for the building, the estimated cost of removal would be \$500,000, which includes the removal of all interior items and finishes, removal and salvage of structure and shell, removal and recycling of concrete slab and foundation.

C.Summary of Decommissioning Costs

The following tables summarize decommissioning costs.

Table 4.C.1 Decommissioning Cost Summary (in current dollars) *

Cost Item	Description	Total Cost Costs
Removal of Wind Turbines and Foundations	Crane operation to dismantle tower. Preparation of tower to dismantle, oil removal, cut power, etc. tower dismantle and salvage preparation. Demolition of footings and foundations, including transport to recycling center, imported topsoil and grading.	\$ 3,310,000.00
Total Project BOP	Mobilization and removal of underground collection line where necessary and junction boxes, poles, guy wires, and conductors. Removal of the substation equipment, power circuit breakers, fencing, etc. Removal, disposal, and hauling of gravel. Decompaction of road bed, importing of topsoil, grading, and re-vegetation.	\$ 1,075,800.00
Sub-Total Decommissioning Cost		\$ 4,385,800.00
Contingency (10%)		\$ 438,580.00
Owner Indirect Cost (5%)		\$ 219,290.00
Total Project Decommissioning Cost		\$ 5,043,670.00