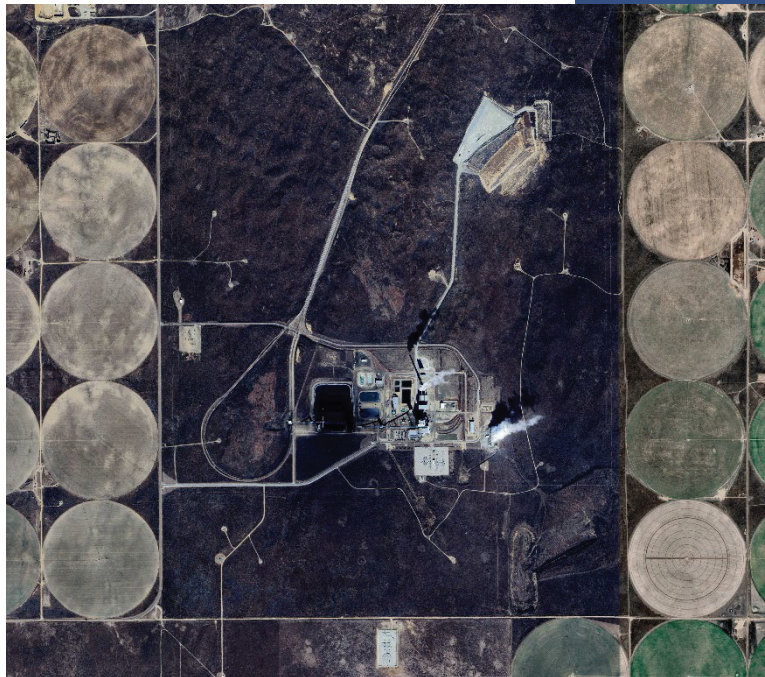




***2025 Annual Report 257.90(e)  
Sunflower Electric Power Corporation  
Holcomb Common Facilities, LLC***



***Prepared for:***



***AEC File No. 26001-0:4908  
January 13, 2026***

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**ATTEST**

In our professional judgment and to the best of our knowledge, the results and conclusions presented in this document are accurate, and the document has been prepared using sound scientific methods.

**ALLIED ENVIRONMENTAL CONSULTANTS, INC.**



**Theodore B. Francis, P.E.**  
**Project Engineer**



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## 1.0 EXECUTIVE SUMMARY

Sunflower operated the CCR unit pursuant to the detection monitoring program under Code of Federal Regulations (CFR) Title 40 Section 257.94.

In the Spring 2025 event, there were two (2) exceedances over the prediction limits for the intrawell method indicating possible SSIs for the event. Sunflower elected to run additional statistical analyses (interwell methods) to determine if the SSIs were attributable to variations in water quality across the network. The interwell analysis showed that these two exceedances were not SSIs across the network. In the Fall 2025 event there were two (2) exceedances over the prediction limits for the intrawell method. Again, Sunflower elected to run additional statistical analyses (interwell methods). The interwell analysis showed that these two exceedances were not SSIs across the network. A summary of the SSIs for the Spring and Fall 2025 events are shown in Table 1-1 and Table 1-2.

**Table 1-1:** Spring 2025 Event - Exceedances of Prediction Limits, Intrawell

Well	Parameter	Concentration	Prediction Limit	Location <sup>1</sup>	Action
H-1	Chloride	6.33 mg/L	6.153 mg/L	Side-gradient	Additional Stats
H-6	Total Dissolved Solids	368 mg/L	354.1 mg/L	Down-gradient	Additional Stats

**Table 1-2:** Fall 2025 Event - Exceedances of Prediction Limits, Intrawell

Well	Parameter	Concentration	Prediction Limit	Location <sup>1</sup>	Action
H-5	Total Dissolved Solids	476 mg/L	468 mg/L	Side-gradient	Additional Stats
H-6	Total Dissolved Solids	764 mg/L	369 mg/L	Down-gradient	Additional Stats

Note 1: Location relative to landfill and groundwater flow direction.

Originally and in accordance with 40 CFR 257.94(e), Sunflower prepared an “Alternate Source Demonstration” (ASD) certified by a qualified professional engineer due to the SSIs in compliance wells H-1, H-5, and H-6 in 2023. This ASD was placed in the operating record. Currently, Sunflower relies on additional statical analyses to determine the validity of an SSI.

The facility has been in detection monitoring since April 18, 2018, as required under the CCR Rule, and has not required corrective measures to date.

\*\_\*\_\*\_\*\_\*

## **2.0 APPLICABILITY UNDER 40 CFR 257.90**

### *2.1 CCR UNIT SUBJECT TO 40 CFR § 257.90(a)*

The Sunflower Electric Holcomb Landfill is a coal combustion residual (CCR) landfill subject to the requirements described under the 40 CFR §257.90 through §257.98.

### *2.2 ANNUAL REPORTING 40 CFR § 257.90(e)*

40 CFR §257.91 requires the installation of a groundwater monitoring system and 40 CFR §257.93 requires that groundwater sampling and analysis be conducted prior to October 17, 2017. As required in §257.94 the status of the groundwater monitoring is provided herein.

\*\_\*\_\*\_\*\_\*

### 3.0 DATA FOR 2025

#### 3.1 *SITE MAP 40 CFR § 257.90(e)(1)*

Appendix A, Figure 1 provides a map showing the unit and upgradient and downgradient monitoring wells. This information is also provided in the Monitoring Well Installation Report which is included in the facility's operating record as required by §257.105(h)(2).

#### 3.2 *WELL NETWORK STATUS 40 CFR § 257.90(e)(2)*

Sunflower did not install or decommission any monitoring wells during 2025. The Monitoring Well Installation Report included in the facility's operating record is current with the wells present at the landfill.

#### 3.3 *MONITORING WELL DATA 40 CFR § 257.90(e)(3)*

As required in §257.94(b), Sunflower collected semiannual samples from all background and downgradient monitoring wells. Table 1 in Appendix B summarizes the related information including the sample names, dates, and analytical results.

#### 3.4 *MONITORING PROGRAM STATUS 40 CFR § 257.90(e)(4)*

2025 was the eighth year of the detection monitoring program for Sunflower as shown in Appendix B, Table 1. As described in Section 1.0, the compliance wells exceeded the prediction limits in the Fall 2022, 2023, 2024 and 2025 events; however, the ASD and additional statistical analyses show the detections are from natural variations in groundwater quality and from an upgradient/off-site source.

Sunflower prepared an ASD in accordance with 40 CFR 257.94(e) due to the increases demonstrated in compliance wells H-1, H-5, and H-6. Subsequently, Sunflower has relied on additional statistical analyses.

#### 3.5 *OTHER INFORMATION 40 CFR § 257.90(e)(5)*

The 2025 Annual Report serves as the report for this CCR Unit and documents all activities that Sunflower conducted to comply with §257.90 through §257.94. None of the activities referenced in §257.90 through §257.98 are relevant to the activities completed in 2025 beyond the provisions of §257.90(e).

\*\_\*\_\*\_\*\_\*

## 4.0 RECORDKEEPING 40 CFR§ 257.90(f)

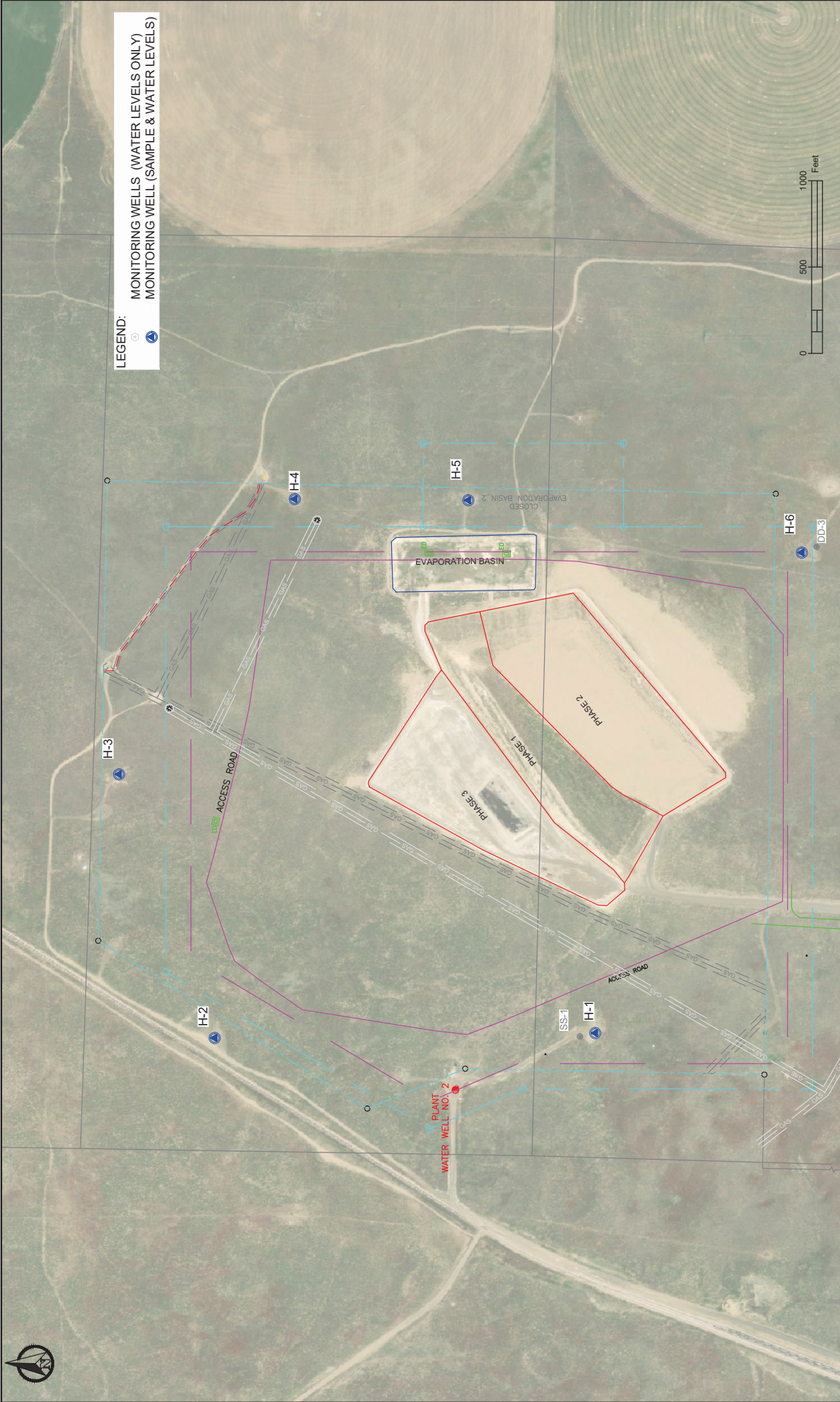
To comply with the recordkeeping requirements:

- The Annual Report must be placed in the facility's operating record, as required by §257.105(h)(1).
- Sunflower will notify the KDHE within 30 days of the Annual Report being placed in the facility's operating record, as required by §257.106(d).
- Sunflower will post the Annual Report on their CCR website within 30 days of the Annual Report being placed in the facility's operating record, as required by §257.107(d).

\*\_\*\_\*\_\*\_\*


## **APPENDIX A**

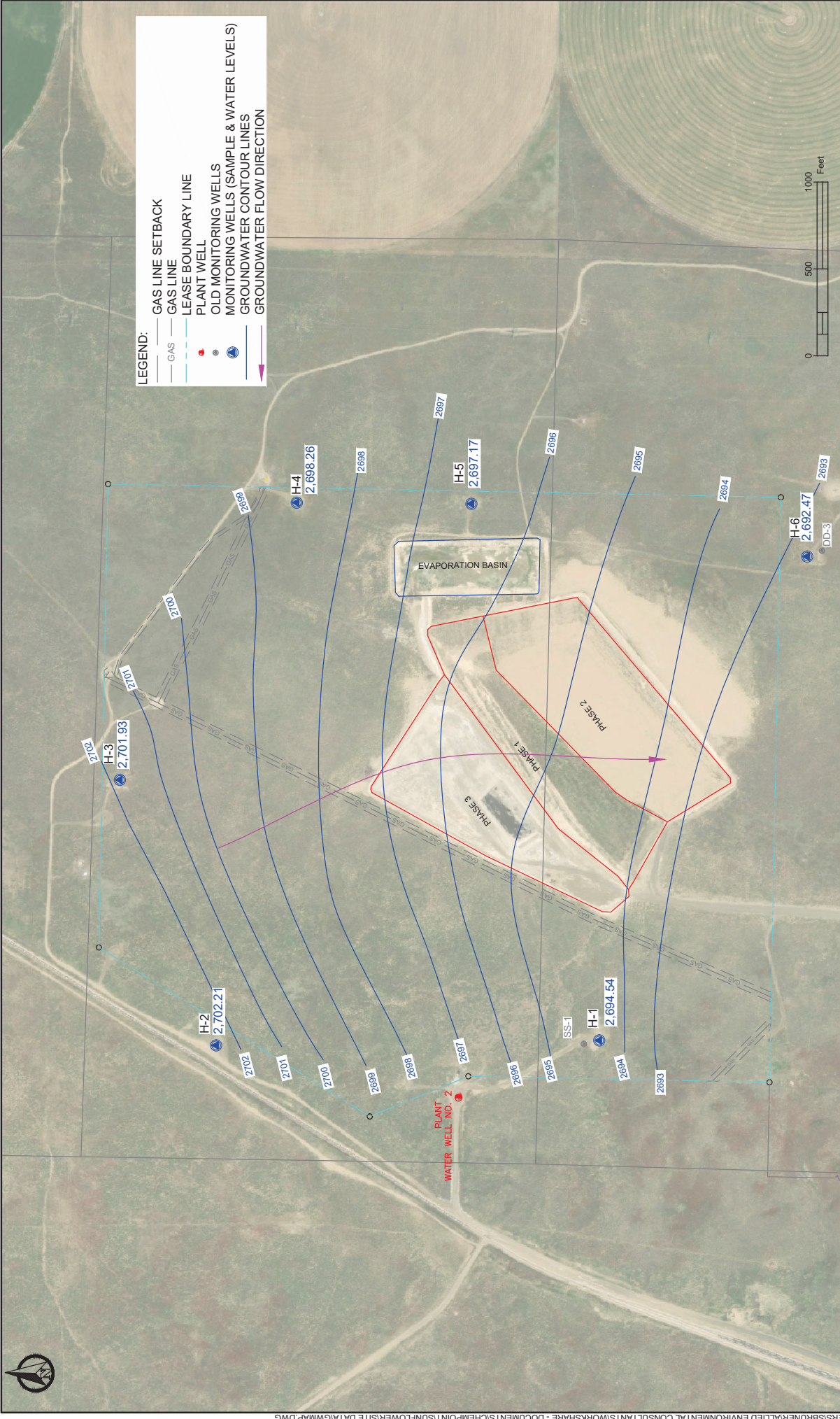
### **FIGURES**



LEGEND:

- MONITORING WELLS (WATER LEVELS ONLY)
- MONITORING WELL (SAMPLE & WATER LEVELS)

<p><b>SUNFLOWER ELECTRIC HOLCOMB, KANSAS PLANT INDUSTRIAL LANDFILL</b></p>	<p><b>LANDFILL SITE MAP</b></p> <p><b>HOLCOMB COMMONS FACILITY, LLC</b></p>	<p><b>FIGURE 1</b></p>
 <p style="font-size: 8px;">727 N. WACO, STE 205 • WICHITA, KS 67203 • 316.262.8898</p>	<p>PROJECT: 25002-24908 SCALE: AS SHOWN DATE: 1/12/2026 DRAWN BY: SMB CHKD BY: TBF</p>	



**LEGEND:**

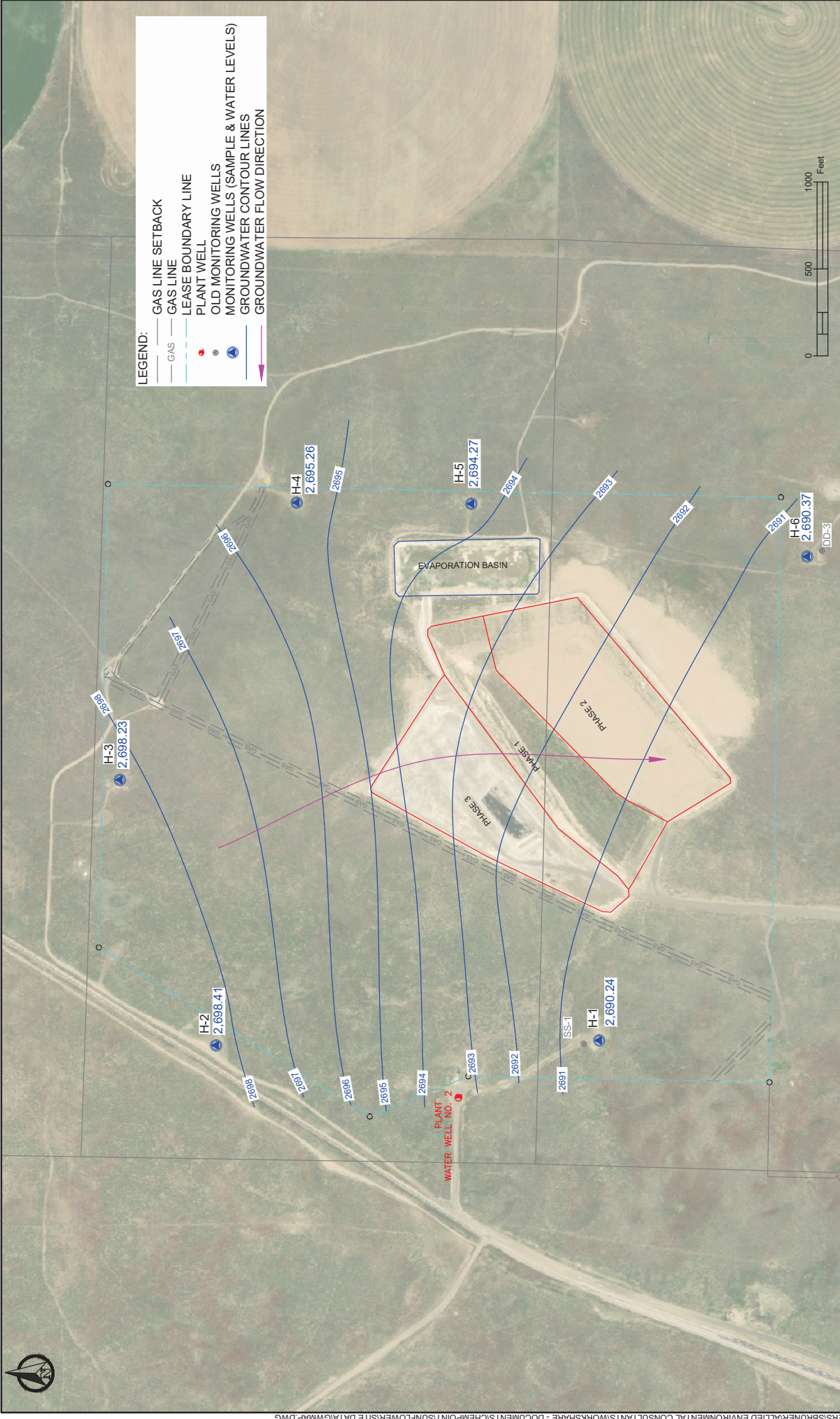
- GAS LINE SETBACK
- GAS LINE
- LEASE BOUNDARY LINE
- PLANT WELL
- OLD MONITORING WELLS
- MONITORING WELLS (SAMPLE & WATER LEVELS)
- GROUNDWATER CONTOUR LINES
- GROUNDWATER FLOW DIRECTION

**GROUNDWATER ELEVATIONS  
APRIL 2025**

PROJECT: 25002-1:4908  
 SCALE: AS SHOWN  
 DATE: 4/16/2025  
 DRAWN BY: SMB  
 CHECK BY: TBF




**SUNFLOWER ELECTRIC  
HOLCOMB, KANSAS PLANT  
INDUSTRIAL LANDFILL**



**LEGEND:**

- GAS LINE SETBACK
- GAS LINE
- LEASE BOUNDARY LINE
- PLANT WELL
- OLD MONITORING WELLS
- MONITORING WELLS (SAMPLE & WATER LEVELS)
- GROUNDWATER CONTOUR LINES
- GROUNDWATER FLOW DIRECTION

<p><b>SUNFLOWER ELECTRIC HOLCOMB, KANSAS PLANT INDUSTRIAL LANDFILL</b></p>	<p><b>GROUNDWATER ELEVATIONS OCTOBER 2025</b></p>	<p><b>FIGURE 3</b></p>
<p>PROJECT: 25002-24908 SCALE: AS SHOWN DATE: 10/15/2025 DRAWN BY: SMB CHKD BY: TBF</p>		
 <p>727 NW 40th Ave. Ste 208 • Wichita, KS 67213 • 316.992.6988</p>		

## **APPENDIX B**

### **DATA SUMMARY - HOLCOMB COMMON FACILITIES, LLC**

**Table 1: Summary of Semi-Annual Analytical Results**  
 Sunflower Electric Power Corporation  
 Holcomb Common Facilities, LLC.

Location	Measure Point Elevation (TOC) *	Sample Date	Depth to Water (BT/OC)	Groundwater Elevation (ft. AMSL)	Field Parameters				Detection Monitoring Appendix III Constituents					
					Temperature (deg F)	Conductivity (µS/cm)	Turbidity (NTU)	pH (su)	Calcium, Total (µg/L)	Chloride (mg/L)	Fluoride (mg/L)	Sulfate (mg/L)	TDS (mg/L)	
														Secondary Maximum Contaminant Level (SMCL):
H-2	2914.71	4/18/2018	196.23	2,718.48	62.7	1588.0	0.55	7.33	ND (150)	260,000	93	0.39	810	1,400
		10/10/2018	200.80	2,713.91	59.0	1678.0	1.02	7.17	ND (150)	270,000	86	ND (0.50)	850	2,900
		4/10/2019	190.60	2,724.11	64.0	1755.0	1.08	7.38	ND (150)	280,000	91	0.32	950	1,500
		10/7/2019	200.00	2,714.71	62.0	1887.0	0.88	7.35	ND (150)	310,000	93	ND (0.5)	50	1,600
		4/7/2020	189.20	2,725.51	65.0	1966.0	0.79	7.24	ND (150)	310,000	84	0.31	860	1,600
		10/6/2020	199.40	2,715.31	66.0	1819.0	1.90	7.59	ND (150)	310,000	89	0.30	840	1,500
		4/6/2021	190.12	2,724.59	64.6	1994.0	1.70	7.26	ND (150)	330,000	89	ND (0.5)	900	1,200
		10/12/2021	200.80	2,713.91	65.6	1886.0	0.49	7.12	ND (150)	320,000	86	ND (0.5)	1,000	1,700***
		4/26/2022	200.50	2,714.21	66.0	1698.0	0.41	7.66	ND (150)	360,000	85	ND (0.5)	1,100	1,700
		10/18/2022	206.60	2,708.11	58.4	2175.0	10.20	7.14	60.6	372,000	91.8	0.330	1,100	1,750
		4/25/2023	206.20	2,708.51	62.0	2040.0	19.90	7.13	59.6	187,000	70.3	0.326	952	1,410
		10/12/2023	209.00	2,705.71	65.4	2183.0	20.30	7.04	67.7	336,000	96.6	0.319	1,230	2,030
		4/17/2024	206.70	2,708.01	66.0	1324.0	2.55	7.11	62.1	217,000	61.4	0.278	785	1,190
		10/15/2024****	213.10	2,701.61	64.0	1211.0	7.95	7.46	71.2	187,000	49.3	0.530	518	910
		4/16/2025	212.50	2,702.21	63.6	1638.0	12.70	7.2	54.1	262,000	73.7	0.354	926	1,120
10/15/2025****	216.30	2,698.41	74.8	1298.0	6.28	7.36	68.5	150,000	44.0	0.408	401	814		
H-3	2905.93	4/18/2018	188.43	2,717.50	62.6	2191.0	7.96	7.29	ND (150)	340,000	90	ND (1.0)	1,200	2,000
		10/10/2018	193.30	2,712.63	58.0	2005.0	3.26	7.23	ND (150)	320,000	87	ND (0.50)	1,100	1,800
		4/10/2019	182.70	2,723.23	64.8	2026.0	2.58	7.32	ND (150)	270,000	78	0.33	1,100	1,800
		10/7/2019	191.60	2,714.33	63.0	2180.0	4.34	7.27	ND (150)	310,000	84	ND (0.5)	1,100	1,700
		4/7/2020	181.20	2,724.73	66.0	2157.0	2.00	7.29	ND (150)	310,000	81	ND (0.5)	1,100	1,800
		10/6/2020	190.70	2,715.23	63.0	2248.0	8.00	7.20	ND (150)	350,000	88	0.30	1,100	1,900
		4/6/2021	182.90	2,723.03	64.8	2284.0	2.96	7.39	ND (150)	340,000	81	ND (0.5)	730**	1,500
		10/12/2021	192.60	2,713.33	65.5	2126.0	2.64	7.13	ND (150)	320,000	84	ND (0.5)	1,200	1,600***
		4/26/2022	191.70	2,714.23	66.0	2000.0	2.29	7.30	ND (150)	340,000	81	ND (1.0)	1,200	1,900
		10/18/2022	198.20	2,707.73	58.4	2360.0	23.00	7.13	55.2	343,000	91.7	0.276	1,220	1,990
		4/25/2023	198.00	2,707.93	61.4	2320.0	17.10	7.22	51	252,000	93	0.28	1,550	1,840
		10/12/2023	200.80	2,705.13	65.1	2388.0	90.10	7.10	65.8	365,000	96.0	0.342	1,390	1,950
		4/17/2024	198.50	2,707.43	67.0	2390.0	7.92	7.16	53.1	282,000	91.1	0.239	1,600	1,940
		10/15/2024****	204.90	2,701.03	63.2	2429.0	12.40	7.26	68.8	370,000	95.4	0.398	1,420	1,900
		4/16/2025	204.00	2,701.93	63.4	2455.0	8.78	7.20	53.8	308,000	94.5	0.323	1,380	1,560
10/15/2025****	207.70	2,698.23	74.0	2369.0	9.78	7.20	59.7	325,000	93.3	0.277	1,260	1,790		
H-4	2901.66	4/18/2018	190.00	2,711.66	62.6	829.3	2.37	7.47	ND (150)	130,000	33	0.51	300	620
		10/10/2018	195.50	2,706.16	58.0	857.0	1.37	7.47	ND (150)	130,000	33	0.46	310	330
		4/10/2019	185.10	2,716.56	63.8	1134.0	1.08	7.48	ND (150)	170,000	42	0.40	510	970
		10/7/2019	193.40	2,708.26	64.0	1182.0	1.07	7.45	ND (150)	170,000	46	0.41	490	910
		4/7/2020	183.90	2,711.76	66.0	1208.0	0.88	7.47	ND (150)	200,000	47	0.39	540	1,000
		10/6/2020	192.50	2,709.16	65.0	1186.0	1.40	7.41	ND (150)	190,000	50	0.38	520	960
		4/6/2021	185.10	2,716.56	64.1	1318.0	0.90	7.38	ND (150)	220,000	53	0.38	5**	1,100
		10/12/2021	193.90	2,707.76	66.0	1159.0	0.72	7.31	ND (150)	200,000	48	0.57	590	860***
		4/26/2022	192.30	2,709.36	66.0	1206.0	0.45	7.39	ND (150)	230,000	50	ND (0.5)	660	1,100
		10/18/2022	198.70	2,702.96	60.1	1590.0	2.07	7.18	33.9	169,000	56.6	0.348	661	1,160
		4/25/2023	198.00	2,703.66	60.7	1520.0	2.04	7.38	45	217,000	61	0.36	835	1,150
		10/12/2023	200.00	2,701.66	65.8	1515.0	2.22	7.20	40.8	201,000	59.9	0.449	726	1,230
		4/17/2024	198.00	2,703.66	68.0	892.0	1.35	7.34	38.6	116,000	39.2	0.331	232	612
		10/15/2024****	204.20	2,697.46	61.3	841.0	2.08	7.25	43.1	119,000	41.2	0.510	148	616
		4/16/2025	203.40	2,698.26	63.4	919.9	1.54	7.20	35.4	110,000	45.1	0.436	175	658
10/15/2025****	206.40	2,695.26	73.0	977.0	0.95	7.20	ND (50.0)	123,000	43.6	0.378	127	646		

**Table 1: Summary of Semi-Annual Analytical Results**  
Sunflower Electric Power Corporation  
Holcomb Common Facilities, LLC.

Location	Measure Point Elevation (TOC) *	Sample Date	Depth to Water (BTOC)	Groundwater Elevation (ft. AMSL)	Field Parameters			Detection Monitoring Appendix III Constituents						
					Temperature (deg F)	Conductivity (µS/cm)	Turbidity (NTU)	pH (su)	Boron, Total (µg/L)	Calcium, Total (µg/L)	Chloride (mg/L)	Fluoride (mg/L)	Sulfate (mg/L)	TDS (mg/L)
H-1	2924.54	4/18/2018	217.00	2,707.54	64.3	385.3	0.47	7.62	ND (150)	47,000	5	0.57	33	240
		10/10/2018	222.40	2,702.14	58.2	382.0	0.40	7.37	ND (150)	45,000	5	0.53	30	240
		4/10/2019	213.00	2,711.54	65.7	387.7	1.67	7.76	ND (150)	42,000	4	0.51	29	250
		10/7/2019	222.60	2,701.94	62.0	400.0	0.57	7.68	ND (150)	46,000	5	0.48	32	240
		4/7/2020	212.30	2,712.24	65.0	400.0	0.51	7.54	ND (150)	48,000	5	0.49	28	240
		10/6/2020	222.90	2,701.64	64.0	399.0	0.63	7.62	ND (150)	46,000	5.5	0.48	28	140**
		4/6/2021	214.40	2,710.14	64.6	403.6	3.00	7.66	ND (150)	49,000	5.5	0.51	27	110**
		10/12/2021	222.80	2,701.74	66.2	398.7	0.63	7.36	ND (150)	46,000	5.2	0.54	30	37***
		4/26/2022	220.90	2,703.64	66.0	407.2	0.54	7.67	ND (150)	49,000	4	ND (0.5)**	26	240
		10/18/2022	227.10	2,697.44	59.0	397.0	0.85	7.65	41.0	50,200	4.54	0.570	32.6	244
		4/25/2023	225.20	2,699.34	61.9	397.0	1.02	7.29	42	40,700	5	0.282**	39	238
		10/12/2023	228.50	2,696.04	64.5	398.0	0.47	7.25	51.5	44,500	4.93	0.543	35.9	1910**
		4/17/2024	226.00	2,698.54	68.0	401.0	1.62	6.94	42.7	43,300	4.41	0.411	35.9	222
		10/15/2024****	231.50	2,693.04	62.4	400.0	1.79	7.96	48.5	44,600	5.22	0.633	34.5	240
		4/16/2025	230.00	2,694.54	63.3	412.8	1.10	7.36	40.1	44,100	6.33	0.562	37.9	286
10/15/2025****	234.30	2,690.24	74.9	534.0	0.49	7.61	54.0	46,500	5.52	0.198	29.6	252		
H-5	2896.67	4/18/2018	187.80	2,708.87	64.0	409.1	0.97	7.63	ND (150)	59,000	12	0.54	36	250
		10/10/2018	192.70	2,703.97	59.0	425.0	0.52	7.61	ND (150)	56,000	13	0.49	40	280
		4/10/2019	183.90	2,712.77	65.0	425.2	0.83	7.70	ND (150)	57,000	12	0.47	41	280
		10/7/2019	191.10	2,705.57	62.0	426.0	0.62	7.64	ND (150)	57,000	11	0.48	40	280
		4/7/2020	182.70	2,713.97	65.0	432.0	0.54	7.57	ND (150)	57,000	9.6	0.47	39	280
		10/6/2020	190.20	2,706.47	64.0	428.0	1.10	7.59	ND (150)	60,000	10	0.46	41	290
		4/6/2021	182.80	2,713.87	64.1	440.1	1.30	7.60	ND (150)	61,000	10.0	0.49	39	220
		10/12/2021	191.10	2,705.57	65.2	429.5	0.35	7.50	ND (150)	57,000	9.7	0.49	41	240***
		4/26/2022	189.50	2,707.17	66.0	455.5	0.30	7.54	ND (150)	63,000	10	ND (0.5)**	45	280
		10/18/2022	194.70	2,701.97	61.7	651.0	2.37	7.30	29.3	80,400	22.0	0.515	145	426
		4/25/2023	194.20	2,702.47	60.5	649.0	1.18	7.56	36	71,600	24	0.42	182	440
		10/12/2023	196.00	2,700.67	65.2	684.0	3.25	7.37	41.3	87,500	24.8	0.465	178	468
		4/17/2024	195.00	2,701.67	68.0	654.0	1.72	7.45	39.0	79,100	25.2	0.306	215	442
		10/15/2024****	200.00	2,696.67	62.5	686.0	1.74	7.53	48.3	96,700	25.2	0.550	188	410
		4/16/2025	199.50	2,697.17	62.6	618.5	0.90	7.47	38.4	84,800	24.8	0.470	182	310
10/15/2025****	202.40	2,694.27	69.2	780.0	1.29	7.51	ND (50.0)	86,500	23.9	0.386	165	476		
H-6	2940.37	4/18/2018	239.30	2,701.07	64.8	471.3	0.59	7.56	ND (150)	70,000	13	0.54	31	310
		10/10/2018	242.70	2,697.67	60.0	468.0	0.50	7.56	ND (150)	68,000	13	0.51	28	310
		4/10/2019	237.10	2,703.27	65.4	473.1	0.50	7.65	ND (150)	69,000	12	0.51	28	310
		10/7/2019	242.30	2,698.07	63.0	478.0	0.52	7.64	ND (150)	69,000	13	0.51	31	270
		4/7/2020	237.00	2,703.37	65.0	488.0	0.81	7.58	ND (150)	70,000	12	0.50	28	320
		10/6/2020	242.00	2,698.37	64.0	486.0	0.33	7.51	ND (150)	67,000	12	0.49	30	280
		4/6/2021	232.70	2,707.67	64.6	465.8	4.12	7.60	ND (150)	58,000	11.0	0.56	32	270
		10/12/2021	241.60	2,698.77	64.8	463.2	0.32	7.46	ND (150)	65,000	11.0	0.53	31	340***
		4/26/2022	240.40	2,699.97	66.0	460.6	0.44	7.55	ND (150)	69,000	10	ND (0.5)**	29	300
		10/18/2022	244.20	2,696.17	62.4	449.0	2.23	7.41	25.4	51,400	10.3	0.573	35.1	276
		4/25/2023	243.20	2,697.17	61.1	449.0	1.29	7.61	38	51,900	11	0.50	43	310
		10/12/2023	245.00	2,695.37	66.4	458.0	0.63	7.39	35.9	53,800	11.1	0.582	38.3	306
		4/17/2024	244.90	2,695.47	68.0	464.0	3.06	7.56	37.9	54,500	10.6	0.426	39.8	304
		10/15/2024****	247.60	2,692.77	62.3	466.0	1.49	7.65	41.8	56,500	10.7	0.649	30.7	254
		4/16/2025	247.90	2,692.47	62.8	461.4	2.40	7.56	32.8	54,900	11.6	0.567	29.9	368
10/15/2025****	250.00	2,690.37	71.0	590.0	1.17	7.53	ND (50.0)	54,440	9.8	0.503	20.2	764		

Notes & Abbreviations Key:

\* Measuring point elevation at top of well casing, from survey completed and sealed by Comerstone Professional Services Inc. on February 12, 2016

\*\* Suspected outlier, removed from statistical analysis

\*\*\* The TDS values came from verification sampling conducted on 12/14/2021

\*\*\*\* The Depth to Water values were measured on October 2, 2024 and the groundwater samples were collected on October 15, 2024

\*\*\*\*\* The Depth to Water values were measured on October 9, 2025 and the groundwater samples were collected on October 15, 2025

TOC - Top of Casing

BTOC - below top of casing

ft. AMSL - Feet Above Mean Sea Level

deg F - Degrees Fahrenheit

µS/cm - microSiemens per centimeter

Allied Environmental Consultants, Inc.

su - standard units

µg/L - micrograms per Liter

mg/L - milligrams per Liter

NE - Not Established

Bold values exceed SMCL value

**APPENDIX C**

**REGULATORY CROSS  
REFERENCE- HOLCOMB COMMON FACILITIES, LLC**

## REGULATORY CROSS REFERENCE

### 2025 Annual Report

Sunflower Electric Power Corporation  
Holcomb Common Facilities, LLC.

Regulatory Citation	Annual Report Section or Compliance Narrative
<p>§257.90 Applicability. (a)</p> <p>(a) All CCR landfills, CCR surface impoundments, and lateral expansions of CCR units are subject to the groundwater monitoring and corrective action requirements under §§257.90 through 257.98.</p>	<p>See Annual Report, Section 2.1</p>
<p>§257.90 Applicability. (b)(1)(i)</p> <p>(b) <i>Initial timeframes - (1) Existing CCR landfills and existing CCR surface impoundments.</i> No later than October 17, 2017, the owner or operator of the CCR unit must be in compliance with the following groundwater monitoring requirements:</p> <p>(b)(i) Install the groundwater monitoring system as required by §257.91;</p>	<p>Sunflower installed the required groundwater monitoring system in 2016. Sunflower has placed installation reports and certifications in the operating record.</p>
<p>§257.90 Applicability. (b)(1)(ii)</p> <p>(b)(ii) Develop the groundwater sampling and analysis program to include selection of the statistical procedures to be used for evaluating groundwater monitoring data as required by §257.93;</p>	<p>Sunflower has prepared a groundwater sampling and analysis plan with accompanying statistical procedures as required by this subsection.</p>
<p>§257.90 Applicability. (b)(1)(iii)</p> <p>(b)(iii) Initiate the detection monitoring program to include obtaining a minimum of eight independent samples for each background and downgradient well as required by §257.94(b); and</p>	<p>Sunflower completed the collection and analysis of a minimum of eight independent samples in 2017 for all wells at the subject landfill.</p>
<p>§257.90 Applicability. (b)(1)(iv)</p> <p>(b)(iv) Begin evaluating the groundwater monitoring data for statistically significant increases over background levels for the constituents listed in appendix III of this part as required by §257.94.</p>	<p>Sunflower has begun to evaluate the data using the procedures described in the groundwater sampling and analysis plan.</p>

Regulatory Citation	Annual Report Section or Compliance Narrative
<p>§257.90 Applicability. (b)(2)</p> <p>(2) <i>New CCR landfills, new CCR surface impoundments, and all lateral expansions of CCR units.</i> Prior to initial receipt of CCR by the CCR unit, the owner or operator must be in compliance with the groundwater monitoring requirements specified in paragraph (b)(1)(i) and (ii) of this section. In addition, the owner or operator of the CCR unit must initiate the detection monitoring program to include obtaining a minimum of eight independent samples for each background well as required by §257.94(b).</p>	<p>The subject landfill pre-dates the CCR regulations. This subsection does not apply to the subject facility at this time.</p>
<p>§257.90 Applicability. (c)</p> <p>(c) Once a groundwater monitoring system and groundwater monitoring program has been established at the CCR unit as required by this subpart, the owner or operator must conduct groundwater monitoring and, if necessary, corrective action throughout the active life and post-closure care period of the CCR unit.</p>	<p>Sunflower initiated a post-background detection monitoring in 2018.</p>
<p>§257.90 Applicability. (d)</p> <p>(d) In the event of a release from a CCR unit, the owner or operator must immediately take all necessary measures to control the source(s) of releases so as to reduce or eliminate, to the maximum extent feasible, further releases of contaminants into the environment. The owner or operator of the CCR unit must comply with all applicable requirements in §§257.96, 257.97, and 257.98.</p>	<p>Sunflower will respond accordingly should a release occur at this facility.</p>

Regulatory Citation	Annual Report Section or Compliance Narrative
<p>§257.90 Applicability. (e)</p> <p>(e) <i>Annual groundwater monitoring and corrective action report.</i> For existing CCR landfills and existing CCR surface impoundments, no later than January 31, 2018, and annually thereafter, the owner or operator must prepare an annual groundwater monitoring and corrective action report. For new CCR landfills, new CCR surface impoundments, and all lateral expansions of CCR units, the owner or operator must prepare the initial annual groundwater monitoring and corrective action report no later than January 31 of the year following the calendar year a groundwater monitoring system has been established for such CCR unit as required by this subpart, and annually thereafter. For the preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. For purposes of this section, the owner or operator has prepared the annual report when the report is placed in the facility's operating record as required by §257.105(h)(1). At a minimum, the annual groundwater monitoring and corrective action report must contain the following information, to the extent available:</p>	<p>(see below for Annual report content requirements)</p>
<p>§257.90 Applicability. (e)(1)</p> <p>(1) A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;</p>	<p>See Annual Report, Section 3.1.</p>
<p>§257.90 Applicability. (e)(2)</p> <p>(2) Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;</p>	<p>See Annual Report, Section 3.2.</p>
<p>§257.90 Applicability. (e)(3)</p> <p>(3) In addition to all the monitoring data obtained under §§257.90 through 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;</p>	<p>See Annual Report, Section 3.3.</p>

<b>Regulatory Citation</b>	<b>Annual Report Section or Compliance Narrative</b>
<p>§257.90 Applicability. (e)(3)</p> <p>(4) A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels); and</p>	<p>See Annual Report, Section 3.4</p>
<p>§257.90 Applicability. (e)(3)</p> <p>(5) Other information required to be included in the annual report as specified in §§257.90 through 257.98.</p>	<p>See Annual Report, Section 3.5</p>

§257.90 Applicability. (e)

See Annual Report, Section 1.0

(6) A section at the beginning of the annual report that provides an overview of the current status of groundwater monitoring and corrective action programs for the CCR unit. At a minimum, the summary must specify all of the following:

(i) At the start of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in § 257.95;

(ii) At the end of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in § 257.95;

(iii) If it was determined that there was a statistically significant increase over background for one or more constituents listed in appendix III to this part pursuant to § 257.94(e):

(A) Identify those constituents listed in appendix III to this part and the names of the monitoring wells associated with such an increase; and

(B) Provide the date when the assessment monitoring program was initiated for the CCR unit.

(iv) If it was determined that there was a statistically significant level above the groundwater protection standard for one or more constituents listed in appendix IV to this part pursuant to § 257.95(g) include all of the following:

(A) Identify those constituents listed in appendix IV to this part and the names of the monitoring wells associated with such an increase;

(B) Provide the date when the assessment of corrective measures was initiated for the CCR unit;

(C) Provide the date when the public meeting was held for the assessment of corrective measures for the CCR unit; and

(D) Provide the date when the assessment of corrective measures was completed for the CCR unit.

(v) Whether a remedy was selected pursuant to § 257.97 during the current annual reporting period, and if so, the date of remedy selection; and

(vi) Whether remedial activities were initiated or are ongoing pursuant to § 257.98 during the current annual reporting period.

<p>§257.90 Applicability. (f)</p> <p>(f) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in §257.105(h), the notification requirements specified in §257.106(h), and the internet requirements specified in §257.107(h).</p>	<p>See Annual Report, Section 4.0</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------

Source - [80 FR 21468, Apr. 17, 2015, as amended at 81 FR 53516, Aug. 28, 2020]

## **APPENDIX D**

### **SPRING 2025 GROUNDWATER MONITORING REPORT**



June 16, 2025

Revised December 19, 2025

Sunflower Electric Power Corporation  
PO Box 1020  
Hays, Kansas 67601

Attention: Ms. Emily Vsetecka, P.E.  
Manager, Environmental and  
Laboratory Services

via email: [evsetecka@sunflower.net](mailto:evsetecka@sunflower.net)

Reference: Holcomb Common Facilities Industrial Landfill (CCR Unit)  
Spring 2025 Sampling Summary Report Revised  
AEC File No.25002-1:4908

Dear Ms. Vsetecka:

Sunflower has completed the sampling for the Spring 2025 Sampling Event, and this letter reports the validated results. Enclosed with this letter are the groundwater flow map, the chemical laboratory reports, and the statistical analysis. Our qualified groundwater scientist and the project engineer have reviewed this report, as indicated by the signatures below.

#### **Deviations from SAP**

Sunflower did not report deviations from procedures established in the Sampling and Analysis Plan (SAP) submitted to the Kansas Department of Health and Environment (KDHE) on June 23, 2016. However, Sunflower has elected to add interwell prediction limit analysis to the statistics completed to date due to changes in upgradient groundwater quality as described in the Alternate Source Determination (ASD) dated September 18, 2023, and revised February 9, 2024.

#### **Groundwater Flow**

Figure 1 in Attachment 1 shows groundwater elevations and contours converted from static water measurements recorded during the sampling event. Attachment 2 shows the related water level measurements. The general direction of groundwater flow is south-southeast in the northern portion of the landfill while the southern component of flow appears to be to the south to southwest. The groundwater gradient between H-1 and H-2 was 0.0035 feet per foot during this event.

#### **Chemical Data Summary**

Sunflower collected groundwater samples for each well using disposable HydraSleeve devices and decanted them into laboratory-supplied containers. Sunflower labeled all containers before placing on ice for shipment to the analytical laboratory under chain-of-custody protocol. Sunflower submitted the samples to ALS Laboratory Group, located in Houston, Texas.

Attachment 2 presents the analytical summary table showing detected analytes. Attachment 3 provides the complete laboratory report. Data validation shows that the data satisfies the quality control standards required in the Sampling and Analysis Plan (SAP).

### SUMMARY OF STATISTICAL ANALYSES RESULTS

In accordance with the SAP and per the regulatory requirements of 40 CFR 257.93, statistical analysis was performed using the Sanitas Technologies Statistical software to evaluate the data. The statistical methods employed include Outlier Analysis, Time Series, Intrawell Prediction Limits and Interwell Prediction Limits Analysis to evaluate each parameter detected in the Sunflower monitoring wells. The specific methods and results are described below.

**Outlier Analysis** identifies anomalous values in the dataset. In this case, Outlier analysis (EPA 1989 Outlier Test) for each parameter is applied to indicate significant variations from the background levels. In many cases, these outlier values can graphically illustrate suspect values that may be attributed to sampling or laboratory error. In other cases, Outlier analysis can be used to aid in the verification of a statistically significant result if other factors can be ruled out. Attachment 4 includes the related Outlier output. As shown therein, multiple samples and constituents were flagged as potential outliers during this event. AEC reviewed the outliers shown in Table 1 below and elected to retain the values due to consistency in results among the constituents and increasing trends.

**Table 1: Detected Outliers**

Parameter	Well	Date
Fluoride	H-1	4/26/2022
		4/25/2023
		4/17/2024
	H-5	4/26/2022
		4/17/2024
	H-6	7/12/2017
		4/26/2022
		4/17/2024
	pH	H-5
Sulfate	H-3	4/4/2017
		7/12/2017
	H-4	4/6/2021

**Time Series Analysis** is performed to determine changes in analytical results over time. Time Series graphs were developed for each analyte detected in each well. These graphs produce observational evidence to evaluate if analyte concentrations are increasing or decreasing in each well. Attachment 4 includes the related Time Series output.

**Trend Analysis** was performed utilizing Sen's Slope/Mann-Kendall analysis at 95% confidence to evaluate statistically significant trends in upgradient and downgradient wells. Table 2 shows the Wells/Parameter pairs that exhibit trends. Given the magnitude of trends, no background data was removed for statistical analysis as the sample size would be low for many of the observed parameters at  $n < 13$  or 14.

**Table 2: Trend Analysis**

Parameter (trend)	Well	Well Type
Calcium (increasing)	H-2	Upgradient
	H-5	Side-gradient
Chloride (increasing)	H-1	Side-gradient
	H-3	Upgradient
	H-4	Upgradient
	H-5	Side-gradient
Fluoride (decreasing)	H-5	Side-gradient
Sulfate (increasing)	H-2	Upgradient
	H-3	Upgradient
	H-4	Upgradient
	H-5	Side-gradient
	H-6	Downgradient
Total Dissolved Solids (increasing)	H-4	Upgradient
	H-5	Side-gradient

**Intrawell Prediction Limit Analysis** is one of the statistical methods recommended by the EPA's Unified Guidance, Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities for facilities involved in compliance monitoring. A Statistically Significant Increase (SSI) is noted when the parameter value from a compliance well exceeds the Prediction Limit for that parameter.

As described in Section 6.2.3 of the Sunflower SAP, Intrawell Prediction Limits (see Attachment 4) are employed only after it has been demonstrated that there has been no prior facility impact on the background data. For certain wells, the data was non-normally distributed requiring non-parametric (vs. parametric) analysis; this will likely change with increases in the sample size. As noted on the graphs in Attachment 4, when the non-parametric test is used, the calculated limit is equal to the highest background value for that parameter. Since there is a relatively small number of observations to date, the limit may be artificially low. Finally, due to the relatively small sample size, seasonality effects will not be able to be determined until 20 observations are available (i.e., n=20).

As shown on the Intrawell Prediction Limit charts in Attachment 4, the compliance value for the following wells/parameters are shown to be above the predicted limits and therefore represent SSIs above background. Parameter values in compliance wells are well below upgradient values.

**Table 3: Intrawell Statistically Significant Increases (SSIs)**

Well	Parameter	Well Type
H-1	Chloride	Side-gradient / Compliance
H-6	Total Dissolved Solids	Downgradient

The Facility Alternate Source Demonstration (ASD) shows that there is an alternate source for the parameters with intrawell SSIs in Site Compliance Wells. It is expected that concentrations of parameters in down-gradient compliance wells will eventually be similar to the elevated concentrations found in up-gradient background wells. Sunflower therefore relied on interwell analysis to determine if the SSIs found via intrawell analysis were indicative of a release or influences from upgradient groundwater quality. The flagged well/parameter pairs utilizing intrawell analysis were not shown as SSIs utilizing interwell analysis.

**Interwell Prediction Limit Analysis:** In accordance with Section 6.2.5 of the Sunflower SAP, Sunflower elected to run Interwell Prediction Limit Analysis on the three (3) site Compliance wells. In lieu of the Tolerance Limit test outlined in the SAP, Sunflower utilized a Prediction Limit analysis at the 95% confidence level. With the pooled background data, seasonality was able to be tested but was not detected for any parameters in compliance wells.

As shown on the Interwell Prediction Limit charts none of the compliance values for the above, or any of the wells/parameters are shown to be above the predicted limits.

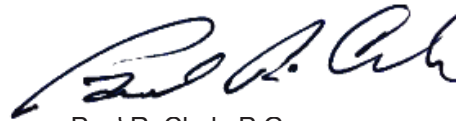
Sunflower will continue with routine monitoring to determine if future statistical analyses indicate a potential release from the landfill. Should you have any questions or comments concerning the results of this investigation, please contact our office at your convenience.

Sincerely,

**ALLIED ENVIRONMENTAL CONSULTANTS, INC.**



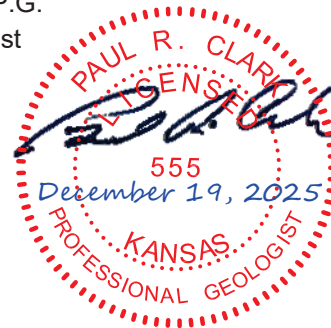
Sheena M Bruner  
Statistical Analyst



Paul R. Clark, P.G.  
Project Geologist



Ted Francis, P.E.  
Project Engineer

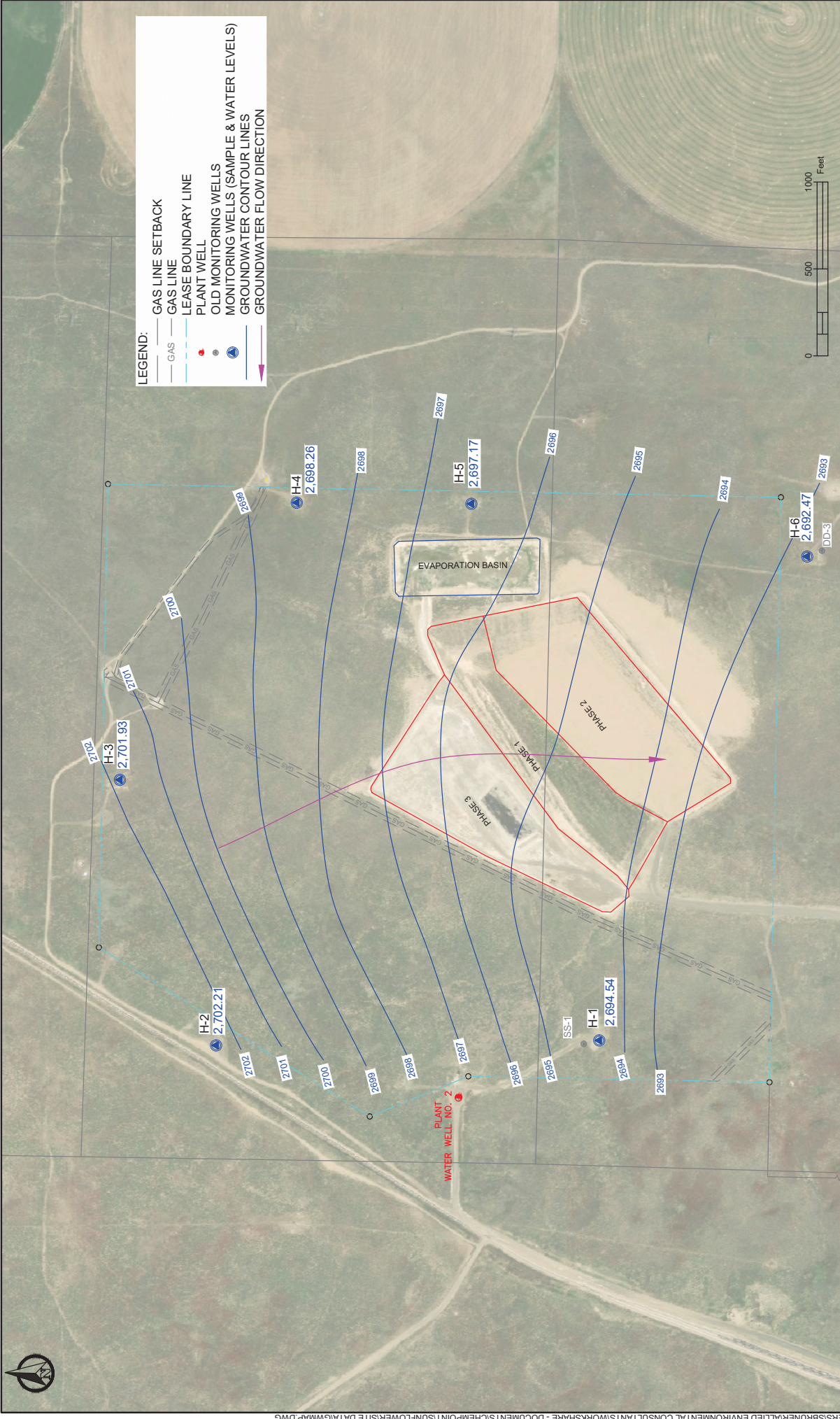


Attachments: 1 – Site Figure, 2 – Table, 3 – Laboratory Report, 4 – Statistical Analysis  
5 - Field Data Sheets

c: Ms. Kandi George (via email: kgeorge@sunflower.net)  
Ms. Justine Sullivan (via email: jsullivan@sunflower.net)


**ATTACHMENT 1**

**FIGURE**



**LEGEND:**

- GAS LINE SETBACK
- GAS LINE
- LEASE BOUNDARY LINE
- PLANT WELL
- OLD MONITORING WELLS
- MONITORING WELLS (SAMPLE & WATER LEVELS)
- GROUNDWATER CONTOUR LINES
- GROUNDWATER FLOW DIRECTION

<p><b>SUNFLOWER ELECTRIC HOLCOMB, KANSAS PLANT INDUSTRIAL LANDFILL</b></p>	<p><b>GROUNDWATER ELEVATIONS APRIL 2025</b></p>	<p><b>FIGURE 1</b></p>
<p>PROJECT: 25002-1:4908 SCALE: AS SHOWN DATE: 4/16/2025 DRAWN BY: SMIB CHECKED BY: TBF</p>		
 <p>727 NW 40th Ave, Ste 200 • Wichita, KS 67213 • 316.992.6088</p>		

**ATTACHMENT 2**

**ANALYTICAL SUMMARY TABLE**

**Table 1: Summary of Spring 2025 Analytical Results**  
 Sunflower Electric Power Corporation  
 Holcomb Common Facilities, LLC.

Location	Measure Point Elevation (TOC) *	Sample Date	Depth to Water (BTOC)	Groundwater Elevation (ft. AMSL)	Field Parameters			Detection Monitoring Appendix III Constituents						
					Temperature (deg F)	Conductivity (µS/cm)	Turbidity (NTU)	pH (su)	Boron, Total (µg/L)	Calcium, Total (µg/L)	Chloride (mg/L)	Fluoride (mg/L)	Sulfate (mg/L)	TDS (mg/L)
Up-Gradient	2914.71	4/16/2025	212.50	2,702.21	63.6	1638.0	12.70	7.20	54.1	262,000	73.7	0.354	926	1,120
	2905.93	4/16/2025	204.00	2,701.93	63.4	2455.0	8.78	7.20	53.8	308,000	94.5	0.323	1,380	1,560
	2901.66	4/16/2025	203.40	2,698.26	63.4	919.9	1.54	7.20	35.4	110,000	45.1	0.436	175	658
Down-Gradient	2924.54	4/16/2025	230.00	2,694.54	63.3	412.8	1.10	7.36	40.1	44,100	6.33	0.562	37.9	286
	2896.67	4/16/2025	199.50	2,697.17	62.6	618.5	0.90	7.47	38.4	84,800	24.8	0.470	182	310
	2940.37	4/16/2025	247.90	2,692.47	62.8	461.4	2.40	7.56	32.8	54,900	11.6	0.567	29.9	368
								6.5 - 8.5	NE	NE	250	2.00	250	500
										Secondary Maximum Contaminant Level (SMCL)				

**Notes & Abbreviations Key:**

\* Measuring point elevation at top of well casing, from survey completed and sealed by Cornerstone Professional Services Inc. on February 12, 2016

BTOC - Top of Casing

BTOC - below top of casing

ft. AMSL - Feet Above Mean Sea Level

deg F - Degrees Fahrenheit

µS/cm - microSeimens per centimeter

NTU - Nephelometric Turbidity Units

su - standard units

µg/L - micrograms per Liter

mg/L - milligrams per Liter

**Bold values exceed SMCL value**

Highlight values indicate SSI

ND - Non-Detect

NE - Not Established

**ATTACHMENT 3**

**LABORATORY REPORT**

**DATA VALIDATION FORM  
ALLIED ENVIRONMENTAL CONSULTANTS**

Project Name: 2025 Spring Event Report

Project/Client Numbers: 25002-1:4908

Laboratory Name & Certification #: ALS Environmental E-10352

Laboratory Episode ID: HS25040926 "Episode" = set of analytical reports represented one COC submittal.

**Part I: Samples Represented In This Episode => Compare COC Form with Lab Identification**

Sample ID	Lab. ID	Sample ID	Lab. ID	Sample ID	Lab. ID	Sample ID	Lab. ID
H1	HS25040926-01	H6	HS25040926-06				
H2	HS25040926-02						
H3	HS25040926-03						
H4	HS25040926-04						
H5	HS25040926-05						

**Part II: HOLDING TIME REQUIREMENTS**

Date Samples Collected	7-Day Holding/Extract	14-Day Holding	Other Holding Date
4/16/2025	4/23/2025		28 Days-5/14/25; 180 Days-10/13/25

**Part III: COMPLETENESS**

Review Item	YES	NO	NA	Note Ref. Or Comment
Sample Manifest or Chain-of-Custody Complete	✓			
Sample receipt / inspection form by Lab – list concerns		✓		
Lab Completed All Request Analysis	✓			
Requested Detection Limits Satisfied	✓			
Extraction & Analytical Holding Times Satisfied	✓			
Sample Preservation Satisfied	✓			
Laboratory Provided Written Narrative – if yes see next page	✓			
Project Analytical Objectives Satisfied	✓			

**Part IV: PROJECT QUALITY CONTROL REQUIREMENTS**

Review Item	YES	NO	NA	Note Reference to Part VI
Trip Blanks accompanied VOC samples		✓		
VOCs Detected in Trip Blank			✓	
Duplicate Samples Collected / Listed on COC		✓		
RPDs for Duplicate vs. Original Sample Acceptable			✓	
Field Blanks Submitted and Analyzed		✓		
Decontamination Blanks Collected and Analyzed		✓		
Matrix Spike/Spike Duplicate Submitted		✓		
Surrogate Recoveries Acceptable, as reported by Lab	✓			
RPDs for MS/MSD Acceptable, as reported by Lab	✓			1.
LCS Percent Recoveries Acceptable	✓			
Analytes Detected in Lab Blank		✓		

RPD - Relative Percent Difference

**PART V: DATA QUALITY ASSESSMENT**

Data is acceptable for use as reported? Acceptable  Not Acceptable

If some or all of the data is **Not Acceptable**, please indicate which analyses require qualification in the Comments Section. Describe how any issue or question regarding data quality or validity has been resolved.

**PART VI: COMMENTS Use additional pages, if needed.**

Note Ref.	Comments (List Questions to Lab)	Describe Resolution
1.	The laboratory reported that for Batch 227270 (samples H1, H2, H3, H4, H5 and H6) the MSD is from an unrelated sample.	

**Laboratory Written Narrative**

Sample ID: HS25041299-02MSD

- MSD is for an unrelated sample



---

10450 Stancliff Rd. Suite 210  
Houston, TX 77099  
T: +1 281 530 5656  
F: +1 281 530 5887



April 30, 2025

Kandi George  
Sunflower Electric Power Corporation  
2440 Holcomb Power  
Holcomb, KS 67851

Work Order: **HS25040926**

Laboratory Results for: **GW Sampling**

Dear Kandi George,

ALS Environmental received 6 sample(s) on Apr 17, 2025 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Generated By: JUMOKE.LAWAL  
Jessica Monfore  
Project manager



**Client:** Sunflower Electric Power Corporation  
**Project:** GW Sampling  
**Work Order:** HS25040926

**SAMPLE SUMMARY**

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Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS25040926-01	H1	Water		16-Apr-2025 09:28	17-Apr-2025 08:50	<input type="checkbox"/>
HS25040926-02	H2	Water		16-Apr-2025 09:51	17-Apr-2025 08:50	<input type="checkbox"/>
HS25040926-03	H3	Water		16-Apr-2025 10:04	17-Apr-2025 08:50	<input type="checkbox"/>
HS25040926-04	H4	Water		16-Apr-2025 10:18	17-Apr-2025 08:50	<input type="checkbox"/>
HS25040926-05	H5	Water		16-Apr-2025 10:53	17-Apr-2025 08:50	<input type="checkbox"/>
HS25040926-06	H6	Water		16-Apr-2025 10:36	17-Apr-2025 08:50	<input type="checkbox"/>

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**Client:** Sunflower Electric Power Corporation  
**Project:** GW Sampling  
**Work Order:** HS25040926

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**CASE NARRATIVE**

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**Metals by Method E200.8**

**Batch ID: 227270**

**Sample ID: HS25041299-02MSD**

- MSD is for an unrelated sample
- 

**WetChemistry by Method E300**

**Batch ID: R511495**

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.
- 

**WetChemistry by Method M2540C**

**Batch ID: R511447**

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.
-

Client: Sunflower Electric Power Corporation  
 Project: GW Sampling  
 Sample ID: H1  
 Collection Date: 16-Apr-2025 09:28

**ANALYTICAL REPORT**  
 WorkOrder:HS25040926  
 Lab ID:HS25040926-01  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		Method:E200.8			Prep:E200.8 / 29-Apr-2025	Analyst: JC
Boron	40.1		20.0	ug/L	1	30-Apr-2025 13:35
Calcium	44,100		500	ug/L	1	30-Apr-2025 13:35
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		Method:E300				Analyst: TH
Chloride	6.33		0.500	mg/L	1	21-Apr-2025 10:39
Fluoride	0.562		0.100	mg/L	1	21-Apr-2025 10:39
Sulfate	37.9		0.500	mg/L	1	21-Apr-2025 10:39
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		Method:M2540C				Analyst: MH
Total Dissolved Solids (Residue, Filterable)	286		10.0	mg/L	1	21-Apr-2025 08:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: Sunflower Electric Power Corporation  
 Project: GW Sampling  
 Sample ID: H2  
 Collection Date: 16-Apr-2025 09:51

**ANALYTICAL REPORT**  
 WorkOrder:HS25040926  
 Lab ID:HS25040926-02  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		Method:E200.8		Prep:E200.8 / 29-Apr-2025		Analyst: JC
Boron	54.1		20.0	ug/L	1	30-Apr-2025 13:56
Calcium	262,000		10000	ug/L	20	30-Apr-2025 15:16
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		Method:E300				Analyst: TH
Chloride	73.7		0.500	mg/L	1	21-Apr-2025 10:44
Fluoride	0.354		0.100	mg/L	1	21-Apr-2025 10:44
Sulfate	926		10.0	mg/L	20	21-Apr-2025 12:06
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		Method:M2540C				Analyst: MH
Total Dissolved Solids (Residue, Filterable)	1,120		10.0	mg/L	1	21-Apr-2025 08:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: Sunflower Electric Power Corporation  
 Project: GW Sampling  
 Sample ID: H3  
 Collection Date: 16-Apr-2025 10:04

**ANALYTICAL REPORT**  
 WorkOrder:HS25040926  
 Lab ID:HS25040926-03  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		<b>Method:E200.8</b>		Prep:E200.8 / 29-Apr-2025		Analyst: JC
Boron	53.8		20.0	ug/L	1	30-Apr-2025 13:58
Calcium	308,000		10000	ug/L	20	30-Apr-2025 15:18
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		<b>Method:E300</b>				Analyst: TH
Chloride	94.5		0.500	mg/L	1	21-Apr-2025 11:31
Fluoride	0.323		0.100	mg/L	1	21-Apr-2025 11:31
Sulfate	1,380		10.0	mg/L	20	21-Apr-2025 12:35
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		<b>Method:M2540C</b>				Analyst: MH
Total Dissolved Solids (Residue, Filterable)	1,560		10.0	mg/L	1	21-Apr-2025 08:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: Sunflower Electric Power Corporation  
 Project: GW Sampling  
 Sample ID: H4  
 Collection Date: 16-Apr-2025 10:18

**ANALYTICAL REPORT**  
 WorkOrder:HS25040926  
 Lab ID:HS25040926-04  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		Method:E200.8		Prep:E200.8 / 29-Apr-2025		Analyst: JC
Boron	35.4		20.0	ug/L	1	30-Apr-2025 14:00
Calcium	110,000		500	ug/L	1	30-Apr-2025 14:00
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		Method:E300				Analyst: TH
Chloride	45.1		0.500	mg/L	1	21-Apr-2025 11:37
Fluoride	0.436		0.100	mg/L	1	21-Apr-2025 11:37
Sulfate	175		2.50	mg/L	5	21-Apr-2025 12:41
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		Method:M2540C				Analyst: MH
Total Dissolved Solids (Residue, Filterable)	658		10.0	mg/L	1	21-Apr-2025 08:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: Sunflower Electric Power Corporation  
 Project: GW Sampling  
 Sample ID: H5  
 Collection Date: 16-Apr-2025 10:53

**ANALYTICAL REPORT**  
 WorkOrder:HS25040926  
 Lab ID:HS25040926-05  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		Method:E200.8			Prep:E200.8 / 29-Apr-2025	Analyst: JC
Boron	38.4		20.0	ug/L	1	30-Apr-2025 14:02
Calcium	84,800		500	ug/L	1	30-Apr-2025 14:02
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		Method:E300				Analyst: TH
Chloride	24.8		0.500	mg/L	1	21-Apr-2025 11:43
Fluoride	0.470		0.100	mg/L	1	21-Apr-2025 11:43
Sulfate	182		2.50	mg/L	5	21-Apr-2025 12:47
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		Method:M2540C				Analyst: MH
Total Dissolved Solids (Residue, Filterable)	310		10.0	mg/L	1	21-Apr-2025 08:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: Sunflower Electric Power Corporation  
 Project: GW Sampling  
 Sample ID: H6  
 Collection Date: 16-Apr-2025 10:36

**ANALYTICAL REPORT**  
 WorkOrder:HS25040926  
 Lab ID:HS25040926-06  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		Method:E200.8		Prep:E200.8 / 29-Apr-2025		Analyst: JC
Boron	32.8		20.0	ug/L	1	30-Apr-2025 14:04
Calcium	54,900		500	ug/L	1	30-Apr-2025 14:04
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		Method:E300				Analyst: TH
Chloride	11.6		0.500	mg/L	1	21-Apr-2025 11:49
Fluoride	0.567		0.100	mg/L	1	21-Apr-2025 11:49
Sulfate	29.9		0.500	mg/L	1	21-Apr-2025 11:49
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		Method:M2540C				Analyst: MH
Total Dissolved Solids (Residue, Filterable)	368		10.0	mg/L	1	21-Apr-2025 08:30

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Weight / Prep Log

**Client:** Sunflower Electric Power Corporation  
**Project:** GW Sampling  
**WorkOrder:** HS25040926

<b>Batch ID:</b> 227270	<b>Start Date:</b> 29 Apr 2025 10:30	<b>End Date:</b> 29 Apr 2025 10:30
<b>Method:</b> TOTAL METALS PREP BY E200.8, REV 5.4, 1994		<b>Prep Code:</b> 200.8PR

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS25040926-01		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25040926-02		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25040926-03		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25040926-04		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25040926-05		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25040926-06		10 (mL)	10 (mL)	1	120 plastic HNO3



**Client:** Sunflower Electric Power Corporation  
**Project:** GW Sampling  
**WorkOrder:** HS25040926

**DATES REPORT**

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
<b>Batch ID: 227270 ( 0 )</b>		<b>Test Name : TOTAL METALS BY E200.8, REV 5.4, 1994</b>			<b>Matrix: Water</b>	
HS25040926-01	H1	16 Apr 2025 09:28		29 Apr 2025 10:30	30 Apr 2025 13:35	1
HS25040926-02	H2	16 Apr 2025 09:51		29 Apr 2025 10:30	30 Apr 2025 15:16	20
HS25040926-02	H2	16 Apr 2025 09:51		29 Apr 2025 10:30	30 Apr 2025 13:56	1
HS25040926-03	H3	16 Apr 2025 10:04		29 Apr 2025 10:30	30 Apr 2025 15:18	20
HS25040926-03	H3	16 Apr 2025 10:04		29 Apr 2025 10:30	30 Apr 2025 13:58	1
HS25040926-04	H4	16 Apr 2025 10:18		29 Apr 2025 10:30	30 Apr 2025 14:00	1
HS25040926-05	H5	16 Apr 2025 10:53		29 Apr 2025 10:30	30 Apr 2025 14:02	1
HS25040926-06	H6	16 Apr 2025 10:36		29 Apr 2025 10:30	30 Apr 2025 14:04	1
<b>Batch ID: R511447 ( 0 )</b>		<b>Test Name : TOTAL DISSOLVED SOLIDS BY SM2540C</b>			<b>Matrix: Water</b>	
HS25040926-01	H1	16 Apr 2025 09:28			21 Apr 2025 08:30	1
HS25040926-02	H2	16 Apr 2025 09:51			21 Apr 2025 08:30	1
HS25040926-03	H3	16 Apr 2025 10:04			21 Apr 2025 08:30	1
HS25040926-04	H4	16 Apr 2025 10:18			21 Apr 2025 08:30	1
HS25040926-05	H5	16 Apr 2025 10:53			21 Apr 2025 08:30	1
HS25040926-06	H6	16 Apr 2025 10:36			21 Apr 2025 08:30	1
<b>Batch ID: R511495 ( 0 )</b>		<b>Test Name : ANIONS BY E300.0, REV 2.1, 1993</b>			<b>Matrix: Water</b>	
HS25040926-01	H1	16 Apr 2025 09:28			21 Apr 2025 10:39	1
HS25040926-02	H2	16 Apr 2025 09:51			21 Apr 2025 12:06	20
HS25040926-02	H2	16 Apr 2025 09:51			21 Apr 2025 10:44	1
HS25040926-03	H3	16 Apr 2025 10:04			21 Apr 2025 12:35	20
HS25040926-03	H3	16 Apr 2025 10:04			21 Apr 2025 11:31	1
HS25040926-04	H4	16 Apr 2025 10:18			21 Apr 2025 12:41	5
HS25040926-04	H4	16 Apr 2025 10:18			21 Apr 2025 11:37	1
HS25040926-05	H5	16 Apr 2025 10:53			21 Apr 2025 12:47	5
HS25040926-05	H5	16 Apr 2025 10:53			21 Apr 2025 11:43	1
HS25040926-06	H6	16 Apr 2025 10:36			21 Apr 2025 11:49	1

**Client:** Sunflower Electric Power Corporation  
**Project:** GW Sampling  
**WorkOrder:** HS25040926

**QC BATCH REPORT**

Batch ID: 227270 ( 0 )		Instrument: ICPMS06		Method: TOTAL METALS BY E200.8, REV 5.4, 1994						
<b>MBLK</b>	Sample ID: <b>MBLK-227270</b>	Units: <b>ug/L</b>			Analysis Date: <b>30-Apr-2025 13:31</b>					
Client ID:	Run ID: <b>ICPMS06_512193</b>	SeqNo: <b>8807013</b>	PrepDate: <b>29-Apr-2025</b>	DF: <b>1</b>						
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	ND	20.0								
Calcium	ND	500								
<b>LCS</b>	Sample ID: <b>LCS-227270</b>	Units: <b>ug/L</b>			Analysis Date: <b>30-Apr-2025 13:33</b>					
Client ID:	Run ID: <b>ICPMS06_512193</b>	SeqNo: <b>8807014</b>	PrepDate: <b>29-Apr-2025</b>	DF: <b>1</b>						
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	487.9	20.0	500	0	97.6	85 - 115				
Calcium	5063	500	5000	0	101	85 - 115				
<b>MS</b>	Sample ID: <b>HS25041299-02MS</b>	Units: <b>ug/L</b>			Analysis Date: <b>30-Apr-2025 13:46</b>					
Client ID:	Run ID: <b>ICPMS06_512193</b>	SeqNo: <b>8807020</b>	PrepDate: <b>29-Apr-2025</b>	DF: <b>1</b>						
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	506.6	20.0	500	30.42	95.2	70 - 130				
Calcium	93530	500	5000	89980	71.0	70 - 130				O
<b>MS</b>	Sample ID: <b>HS25040926-01MS</b>	Units: <b>ug/L</b>			Analysis Date: <b>30-Apr-2025 13:37</b>					
Client ID: <b>H1</b>	Run ID: <b>ICPMS06_512193</b>	SeqNo: <b>8807016</b>	PrepDate: <b>29-Apr-2025</b>	DF: <b>1</b>						
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	530	20.0	500	40.12	98.0	70 - 130				
Calcium	49960	500	5000	44080	118	70 - 130				O
<b>MSD</b>	Sample ID: <b>HS25041299-02MSD</b>	Units: <b>ug/L</b>			Analysis Date: <b>30-Apr-2025 13:48</b>					
Client ID:	Run ID: <b>ICPMS06_512193</b>	SeqNo: <b>8807021</b>	PrepDate: <b>29-Apr-2025</b>	DF: <b>1</b>						
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Boron	526.3	20.0	500	30.42	99.2	70 - 130	506.6	3.82	20	
Calcium	93300	500	5000	89980	66.5	70 - 130	93530	0.241	20	SO

**Client:** Sunflower Electric Power Corporation  
**Project:** GW Sampling  
**WorkOrder:** HS25040926

**QC BATCH REPORT**

<b>Batch ID:</b> 227270 ( 0 )		<b>Instrument:</b> ICPMS06		<b>Method:</b> TOTAL METALS BY E200.8, REV 5.4, 1994					
<b>MSD</b>	Sample ID: <b>HS25040926-01MSD</b>	Units: <b>ug/L</b>			Analysis Date: <b>30-Apr-2025 13:39</b>				
Client ID: <b>H1</b>	Run ID: <b>ICPMS06_512193</b>	SeqNo: <b>8807017</b>		PrepDate: <b>29-Apr-2025</b>		DF: <b>1</b>			
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit Qual

Boron	533.9	20.0	500	40.12	98.8	70 - 130	530	0.733	20
Calcium	49110	500	5000	44080	101	70 - 130	49960	1.7	20 <span style="color: orange;">O</span>

The following samples were analyzed in this batch:

HS25040926-01	HS25040926-02	HS25040926-03	HS25040926-04
HS25040926-05	HS25040926-06		

**Client:** Sunflower Electric Power Corporation  
**Project:** GW Sampling  
**WorkOrder:** HS25040926

**QC BATCH REPORT**

<b>Batch ID:</b> R511447 ( 0 )	<b>Instrument:</b> Balance1	<b>Method:</b> TOTAL DISSOLVED SOLIDS BY SM2540C
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<b>MBLK</b>	Sample ID: <b>WMBLK-0421025</b>	Units: <b>mg/L</b>	Analysis Date: <b>21-Apr-2025 08:30</b>							
Client ID:	Run ID: <b>Balance1_511447</b>	SeqNo: <b>8790830</b>	PrepDate: DF: <b>1</b>							
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit	Qual

Total Dissolved Solids (Residue, Filterable) ND 10.0

<b>LCS</b>	Sample ID: <b>WLCS-04212025</b>	Units: <b>mg/L</b>	Analysis Date: <b>21-Apr-2025 08:30</b>							
Client ID:	Run ID: <b>Balance1_511447</b>	SeqNo: <b>8790829</b>	PrepDate: DF: <b>1</b>							
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit	Qual

Total Dissolved Solids (Residue, Filterable) 968 10.0 1000 0 96.8 85 - 115

<b>DUP</b>	Sample ID: <b>HS25040926-06 DUP</b>	Units: <b>mg/L</b>	Analysis Date: <b>21-Apr-2025 08:30</b>							
Client ID: <b>H6</b>	Run ID: <b>Balance1_511447</b>	SeqNo: <b>8790828</b>	PrepDate: DF: <b>1</b>							
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit	Qual

Total Dissolved Solids (Residue, Filterable) 348 10.0 368 5.59 20

<b>DUP</b>	Sample ID: <b>HS25040589-08 DUP</b>	Units: <b>mg/L</b>	Analysis Date: <b>21-Apr-2025 08:30</b>							
Client ID:	Run ID: <b>Balance1_511447</b>	SeqNo: <b>8790812</b>	PrepDate: DF: <b>1</b>							
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit	Qual

Total Dissolved Solids (Residue, Filterable) 1644 10.0 1600 2.71 20

<b>The following samples were analyzed in this batch:</b>	HS25040926-01	HS25040926-02	HS25040926-03	HS25040926-04
	HS25040926-05	HS25040926-06		



Client: Sunflower Electric Power Corporation  
Project: GW Sampling  
WorkOrder: HS25040926

QC BATCH REPORT

Batch ID: R511495 ( 0 )	Instrument: ICS-Integrion	Method: ANIONS BY E300.0, REV 2.1, 1993
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<b>MBLK</b>	Sample ID: <b>MBLK</b>	Units: <b>mg/L</b>	Analysis Date: <b>21-Apr-2025 09:14</b>							
Client ID:	Run ID: <b>ICS-Integrion_511495</b>	SeqNo: <b>8791950</b>	PrepDate:	DF: <b>1</b>						
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	ND	0.500								
Fluoride	ND	0.100								
Sulfate	ND	0.500								

<b>LCS</b>	Sample ID: <b>LCS</b>	Units: <b>mg/L</b>	Analysis Date: <b>21-Apr-2025 09:26</b>							
Client ID:	Run ID: <b>ICS-Integrion_511495</b>	SeqNo: <b>8791951</b>	PrepDate:	DF: <b>1</b>						
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	18.24	0.500	20	0	91.2	90 - 110				
Fluoride	4.226	0.100	4	0	106	90 - 110				
Sulfate	18.96	0.500	20	0	94.8	90 - 110				

<b>MS</b>	Sample ID: <b>HS25040976-03MS</b>	Units: <b>mg/L</b>	Analysis Date: <b>21-Apr-2025 11:19</b>							
Client ID:	Run ID: <b>ICS-Integrion_511495</b>	SeqNo: <b>8791963</b>	PrepDate:	DF: <b>20</b>						
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	751.3	10.0	200	546.3	102	80 - 120				
Fluoride	49.69	2.00	40	3.098	116	80 - 120				
Sulfate	453.7	10.0	200	240.2	107	80 - 120				

<b>MS</b>	Sample ID: <b>HS25040926-01MS</b>	Units: <b>mg/L</b>	Analysis Date: <b>21-Apr-2025 11:54</b>							
Client ID: <b>H1</b>	Run ID: <b>ICS-Integrion_511495</b>	SeqNo: <b>8791969</b>	PrepDate:	DF: <b>1</b>						
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	17.47	0.500	10	6.33	111	80 - 120				
Fluoride	2.903	0.100	2	0.5618	117	80 - 120				
Sulfate	48.68	0.500	10	37.87	108	80 - 120				



Client: Sunflower Electric Power Corporation  
Project: GW Sampling  
WorkOrder: HS25040926

QC BATCH REPORT

Batch ID: R511495 ( 0 )      Instrument: ICS-Integrion      Method: ANIONS BY E300.0, REV 2.1, 1993

MSD		Sample ID: HS25040976-03MSD			Units: mg/L		Analysis Date: 21-Apr-2025 11:25			
Client ID:		Run ID: ICS-Integrion_511495			SeqNo: 8791964		PrepDate:		DF: 20	
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	748.5	10.0	200	546.3	101	80 - 120	751.3	0.371	20	
Fluoride	49.72	2.00	40	3.098	117	80 - 120	49.69	0.0644	20	
Sulfate	450.7	10.0	200	240.2	105	80 - 120	453.7	0.657	20	

MSD		Sample ID: HS25040926-01MSD			Units: mg/L		Analysis Date: 21-Apr-2025 12:00			
Client ID: H1		Run ID: ICS-Integrion_511495			SeqNo: 8791970		PrepDate:		DF: 1	
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	17.51	0.500	10	6.33	112	80 - 120	17.47	0.229	20	
Fluoride	2.878	0.100	2	0.5618	116	80 - 120	2.903	0.841	20	
Sulfate	48.59	0.500	10	37.87	107	80 - 120	48.68	0.184	20	

The following samples were analyzed in this batch: HS25040926-01 HS25040926-02 HS25040926-03 HS25040926-04  
HS25040926-05 HS25040926-06



**Client:** Sunflower Electric Power Corporation  
**Project:** GW Sampling  
**WorkOrder:** HS25040926

**QUALIFIERS,  
ACRONYMS, UNITS**

<b>Qualifier</b>	<b>Description</b>
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
M	Manually integrated, see raw data for justification
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL/SDL

<b>Acronym</b>	<b>Description</b>
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitation Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

**CERTIFICATIONS,ACCREDITATIONS & LICENSES**

Agency	Number	Expire Date
Arizona	AZ0793	27-May-2026
Arkansas	88-00356_2024	17-Mar-2026
Dept of Defense	L24-239	30-Apr-2026
Dept of Defense	L24-240	30-Apr-2026
Florida	E87611-38	30-Jun-2025
Illinois	2000322023-11	31-Jul-2025
Kansas	E-10352 2023-2024	31-Jul-2025
Louisiana	03087 2023-2024	30-Jun-2025
Maine	2024017	23-Jun-2026
Minnesota	2856348	31-Dec-2025
Missouri	136	30-Sep-2026
New Hampshire	209425	24-Apr-2026
New Jersey	TX008	30-Jun-2025
North Carolina	624 - 2024	31-Dec-2025
North Dakota	R-193 2023-2024	30-Sep-2025
Oklahoma	2023-140	31-Aug-2025
Pennsylvania	018	30-Jun-2025
Tennessee	TN	30-Apr-2026
Texas	T104704231 TX-C24-00130	30-Apr-2026
Utah	TX026932023-14	31-Jul-2025



Sample Receipt Checklist

Work Order ID: HS25040926  
Client Name: Sunflower EPC

Date/Time Received: 17-Apr-2025 08:50  
Received by: Belinda Gomez

Completed By: /S/ Si Ma 17-Apr-2025 16:58 Reviewed by: /S/ Jessica Monfore 20-Apr-2025 23:55  
eSignature Date/Time eSignature Date/Time

Matrices: WATER Carrier name: FedEx Priority Overnight

- Shipping container/cooler in good condition? Yes  No  Not Present
- Custody seals intact on shipping container/cooler? Yes  No  Not Present
- Custody seals intact on sample bottles? Yes  No  Not Present
- VOA/TX1005/TX1006 Solids in hermetically sealed vials? Yes  No  Not Present
- Chain of custody present? Yes  No  1 Page(s)
- Chain of custody signed when relinquished and received? Yes  No  COC IDs:333532
- Samplers name present on COC? Yes  No
- Chain of custody agrees with sample labels? Yes  No
- Samples in proper container/bottle? Yes  No
- Sample containers intact? Yes  No
- Sufficient sample volume for indicated test? Yes  No
- All samples received within holding time? Yes  No
- Container/Temp Blank temperature in compliance? Yes  No

Temperature(s)/Thermometer(s): 0.7UC/0.7C IR34

Cooler(s)/Kit(s): 53050

Date/Time sample(s) sent to storage: 04/17/2025 16:59

Water - VOA vials have zero headspace? Yes  No  No VOA vials submitted

Water - pH acceptable upon receipt? Yes  No  N/A

pH adjusted? Yes  No  N/A

pH adjusted by:

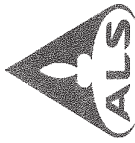
Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:



Cincinnati, OH  
+1 513 733 5336  
Everett, WA  
+1 425 356 2600

# Chain of Custody Form

Page 1 of 1

COC ID: **333532**

ALS Project Manager:

**HS25040926**

Sunflower Electric Power Corporation  
GW Sampling



Customer Information				Project Information			
Purchase Order	Project Name	ALS Project Manager:		A	200.E (Total B, C)		
Work Order	Project Number	G.W. Sampling		B	300.W (Cl. F, SO4)		
Company Name	Bill To Company	Invoice Ath		C	TDS_W 2540C (IDS)		
Send Report To	Kandi George	2440 Holcomb Power		D			
Address	2440 Holcomb Power			E			
City/State/Zip	Holcomb, KS 67851			F			
Phone		Phone	620-277-4784	G			
Fax		Fax		H			
e-Mail Address	kgeorge@sunflower.net	e-Mail Address	kgeorge@sunflower.net	I			
				J			

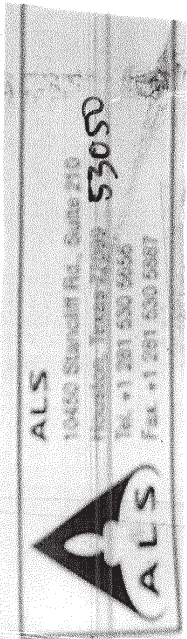
  

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	H1	04/16/2025	09:28A	W	2	2	X	X	X								
2	H2	04/16/2025	09:51A	W	2	2	X	X	X								
3	H3	04/16/2025	10:04A	W	2	2	X	X	X								
4	H4	04/16/2025	10:18A	W	2	2	X	X	X								
5	H5	04/16/2025	10:53A	W	2	2	X	X	X								
6	H6	04/16/2025	10:36A	W	2	2	X	X	X								
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign		Shipment Method		Required Turnaround Time: (Check Box)		Results Due Date:			
Kandi George Kandi George		Other		<input checked="" type="checkbox"/> STD 10 Wk Days	<input type="checkbox"/> 5 Wk Days	<input type="checkbox"/> 24 Hr			
Relinquished by:	Date: 4/16/2025	Time: 2:00 P	Received by:	Notes: Sunflower General Pricing					
Relinquished by:	Date:	Time:	Received by (Laboratory):	Cooler ID: 33050	Cooler Temp: 0.7	QC Package: (Check One Box Below)			
Logged by (Laboratory):	Date:	Time:	Checked by (Laboratory):	<input checked="" type="checkbox"/> Level II SIF CC	<input type="checkbox"/> Level III SIF CC	<input type="checkbox"/> Level IV SIF/MS/CLP	<input type="checkbox"/> Other		
Preservative Key:	1-HCl	2-HNO <sub>3</sub>	3-H <sub>2</sub> SO <sub>4</sub>	4-NaOH	5-Na <sub>2</sub> S <sub>2</sub> O <sub>3</sub>	6-NaHSO <sub>3</sub>	7-Other	8-4°C	9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.  
 2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.  
 3. The Chain of Custody is a legal document. All information must be completed accurately.



53050 APR 17 2025

CUSTODY SEAL		Shipped By <i>Sam</i>
Date <i>04/16/2025</i>	Time <i>04:00pm</i>	Lot # <i>04117125</i>
Receiver <i>Wally George</i>		
Company <i>SunFlower Electric</i>		

Part # 160227-435-EP03/26

ORIGIN ID: 6CKA (620) 277-4784  
 SUNFLOWER ELECTRIC  
 2440 HOLCORN LN  
 HOLCORN, KS 67851  
 UNITED STATES US

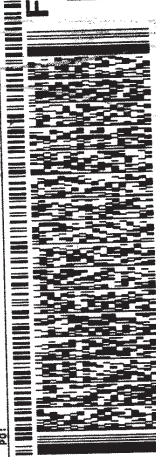
SHIP DATE: 16APR25  
 SHIP WT: 33.05 LB  
 CMO: 6984155/SSFE2600  
 DIMS: 19x15x13 IN  
 BILL CREDIT CARD

ALS  
 10450 STANCLIFF RD STE 210  
 53050

HOUSTON TX 77099

(281) 530-5666 REF: 0201

DEPT:



THU - 17 APR 10:30A  
 PRIORITY OVERNIGHT  
 AHS  
 77099  
 TX-US IAH

TRK# 2876 5052 9376  
 0201

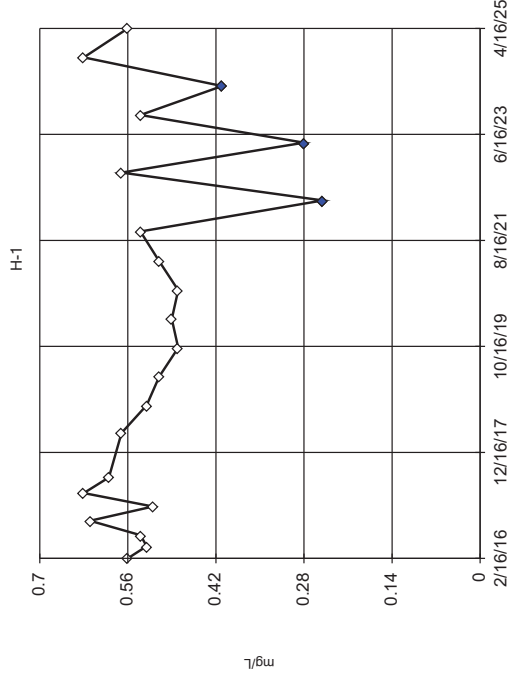
**XS SGRA**



**ATTACHMENT 4**

**STATISTICAL ANALYSIS**

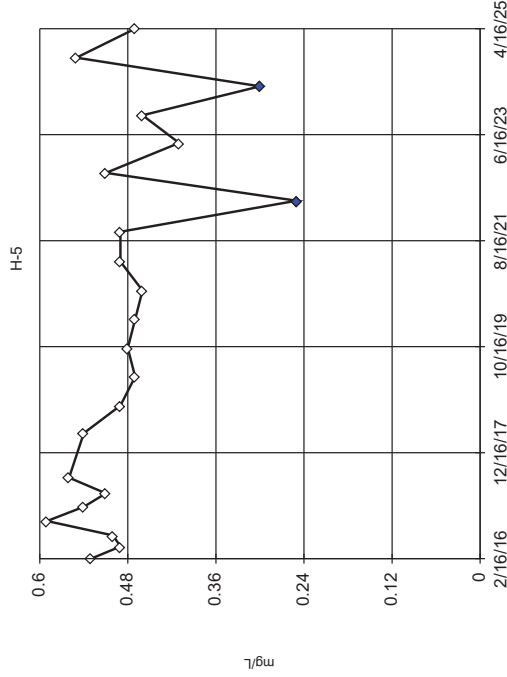
### EPA 1989 Outlier Screening



Constituent: Fluoride Analysis Run 12/17/2025 11:05 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

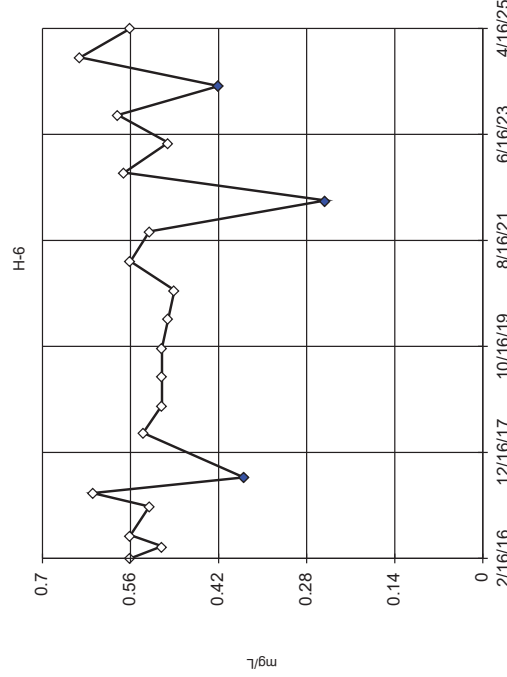
### EPA 1989 Outlier Screening



Constituent: Fluoride Analysis Run 12/17/2025 11:05 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

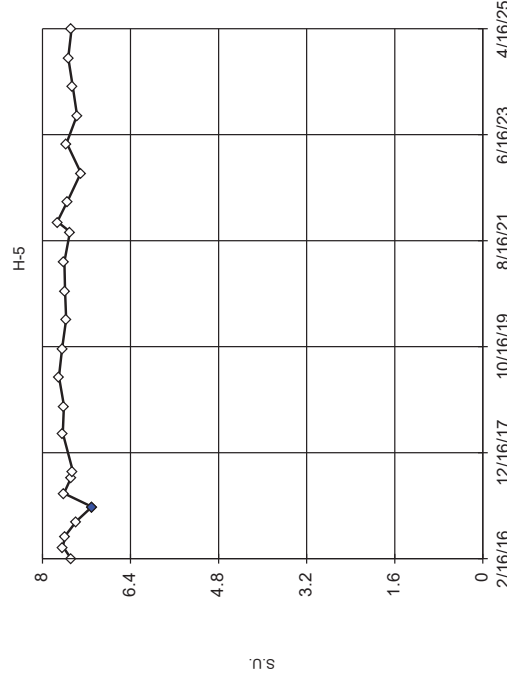
### EPA 1989 Outlier Screening



Constituent: Fluoride Analysis Run 12/17/2025 11:05 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

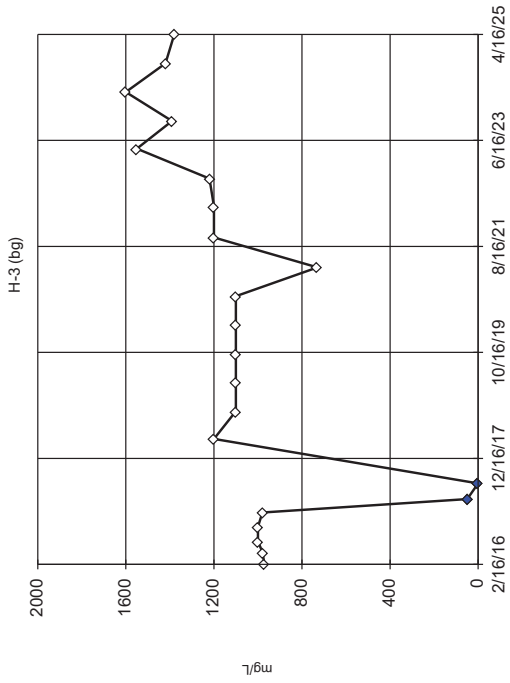
### EPA 1989 Outlier Screening



Constituent: pH Analysis Run 12/17/2025 11:05 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### EPA 1989 Outlier Screening

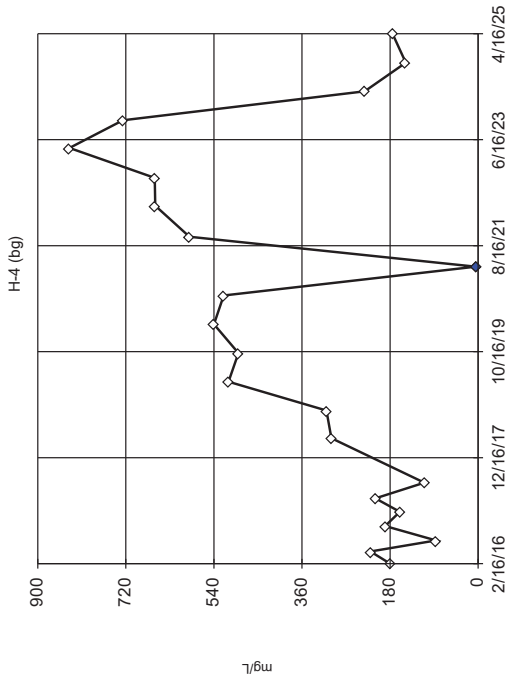


n = 22  
 Statistical outliers are drawn as solid diamonds.  
 Mean: 1082, std. dev.: 393.1, critical Tn: 2.603. After removal of suspect values, mean: 1113, std. dev.: 321.2, Tn: 2.58; mean: 1166, std. dev.: 214.9, Tn: 2.557.  
 Normally test used: Shapiro Wilk (alpha = 0.05). Calculated = 0.9467. Critical = 0.905. The distribution, after removal of suspect values, may not be normally distributed.

Constituent: Sulfate Analysis Run 12/17/2025 11:05 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### EPA 1989 Outlier Screening

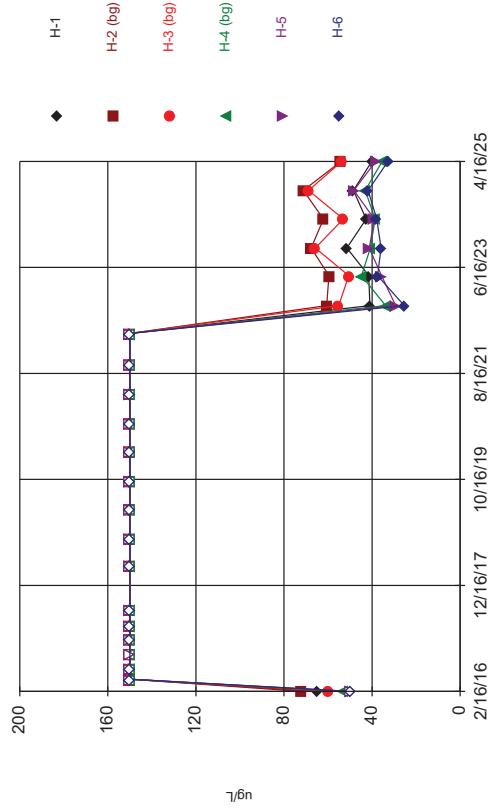


n = 22  
 Statistical outliers are drawn as solid diamonds.  
 Mean: 357.2, std. dev.: 238.9, critical Tn: 2.603. After removal of suspect values, mean: 374, std. dev.: 231.2, Tn: 2.58.  
 Normally test used: Shapiro Wilk (alpha = 0.05). Calculated = 0.8376. Critical = 0.905. The distribution, after removal of suspect values, was found to be log-normal.

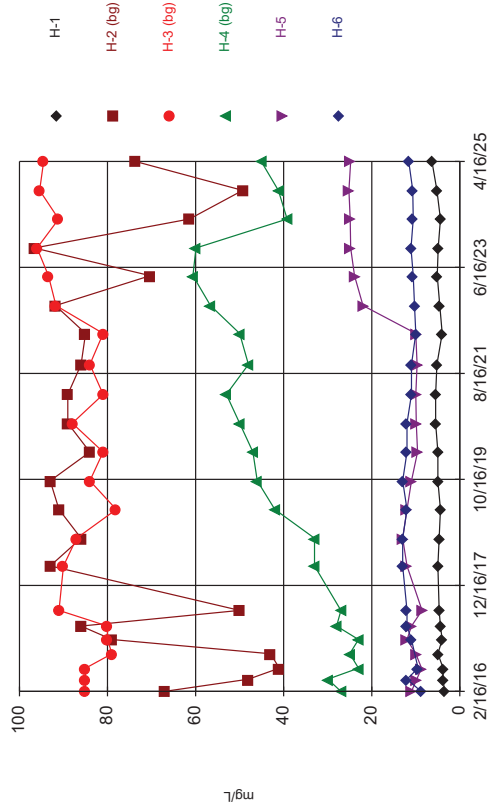
Constituent: Sulfate Analysis Run 12/17/2025 11:05 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

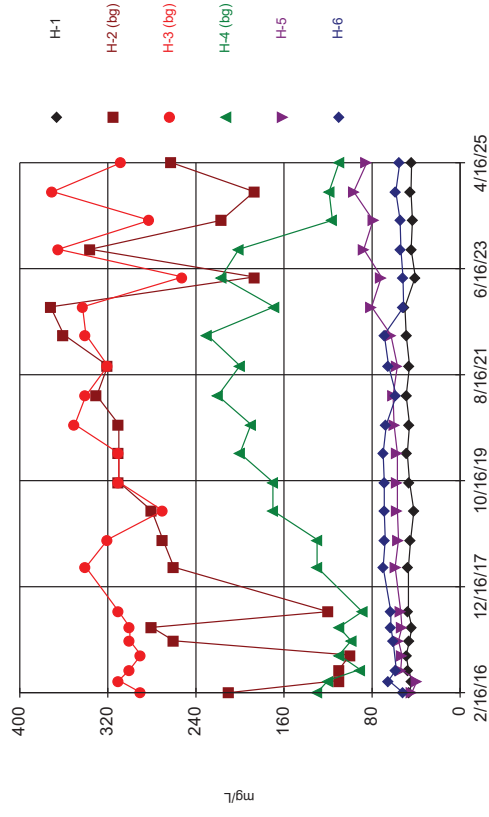
### Time Series



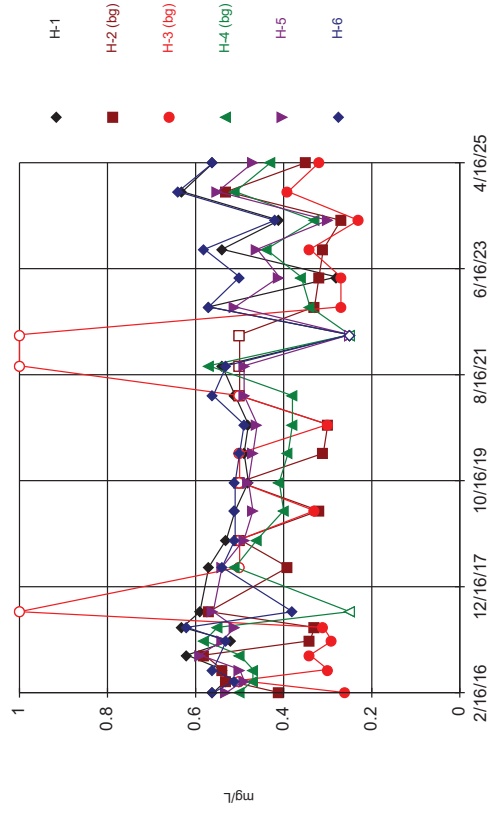
### Time Series



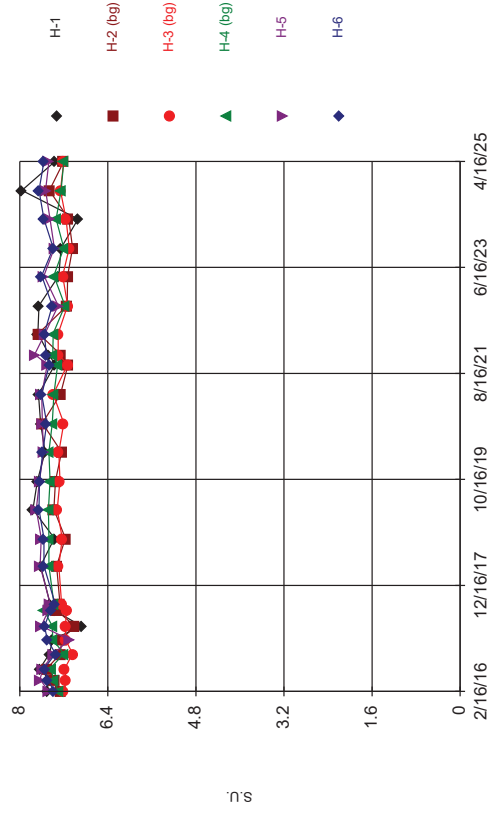
### Time Series



### Time Series



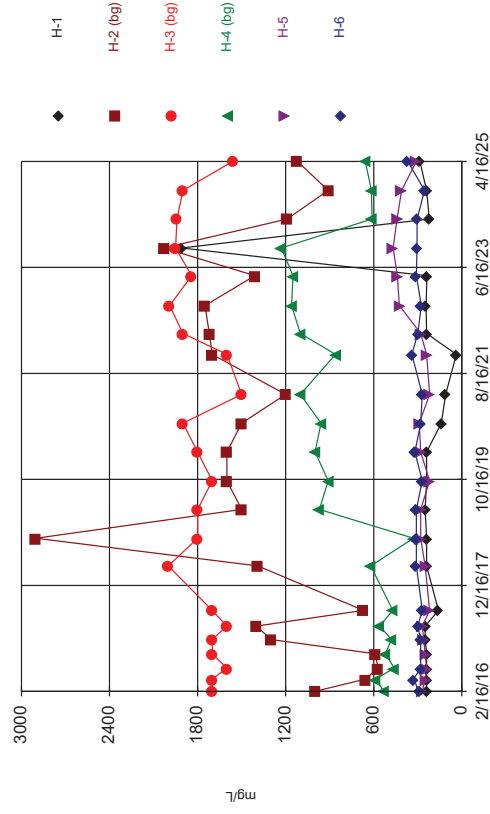
Time Series



Constituent: pH Analysis Run 12/17/2025 12:22 PM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

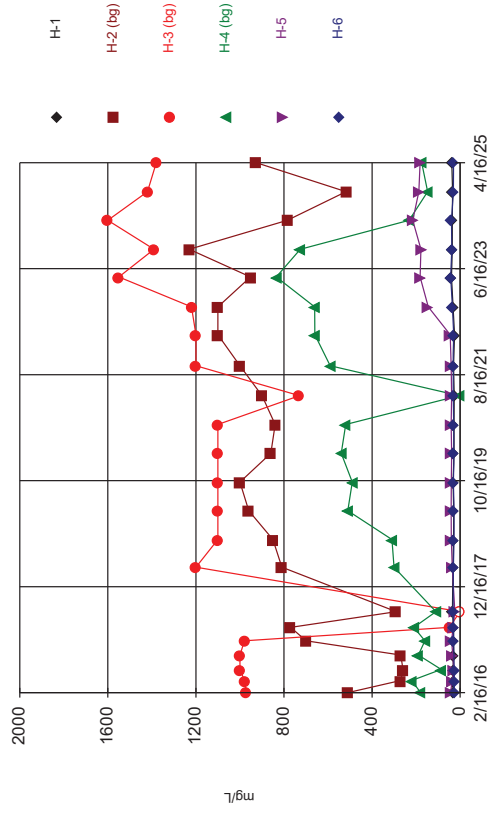
Time Series



Constituent: Total Dissolved Solids Analysis Run 12/17/2025 12:22 PM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

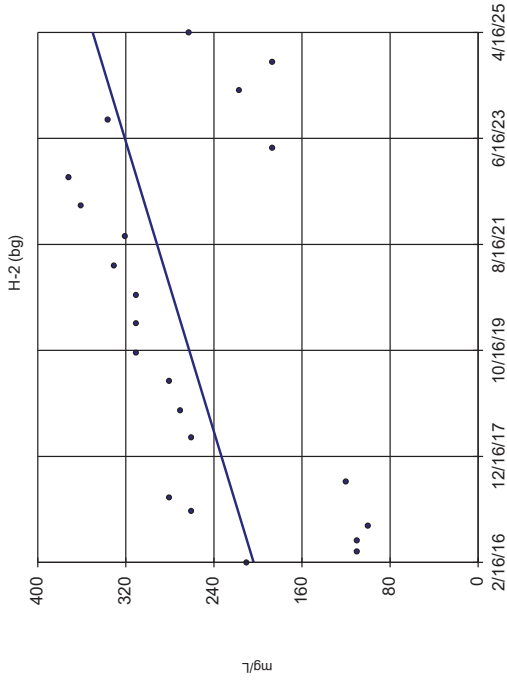
Time Series



Constituent: Sulfate Analysis Run 12/17/2025 12:22 PM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

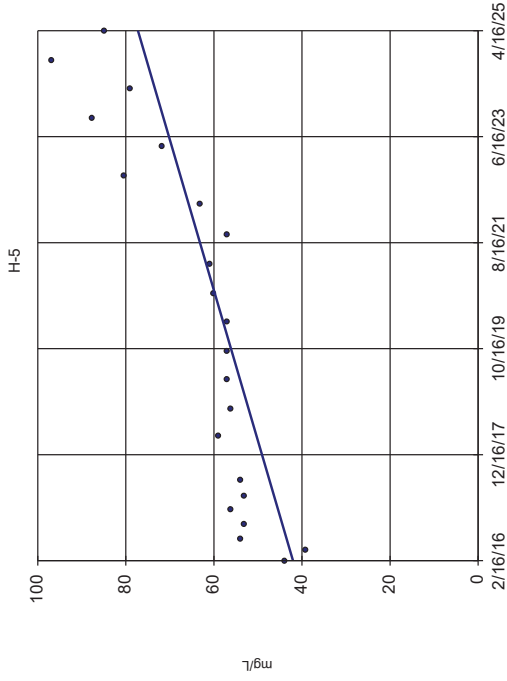
### Sen's Slope Estimator



Constituent: Calcium Analysis Run 12/17/2025 11:55 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

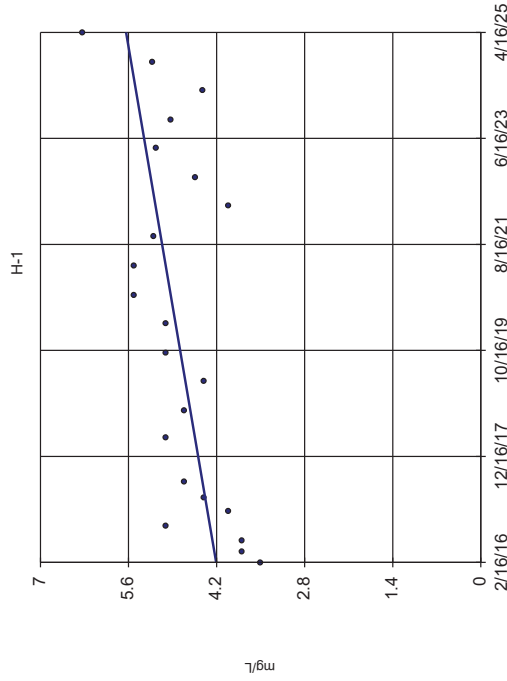
### Sen's Slope Estimator



Constituent: Calcium Analysis Run 12/17/2025 11:56 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

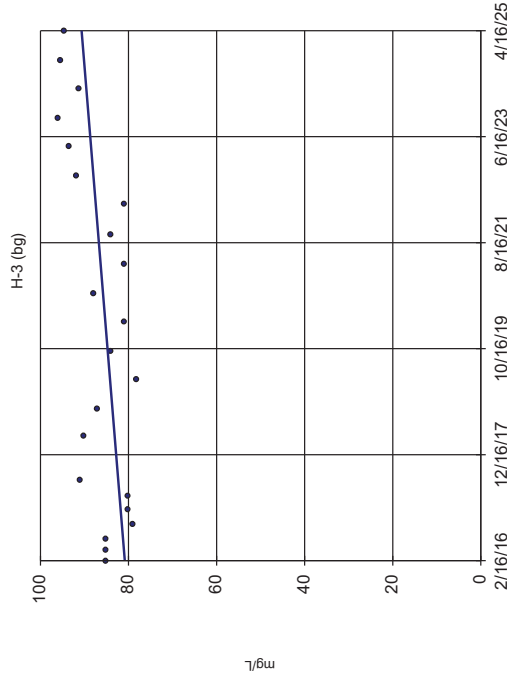
### Sen's Slope Estimator



Constituent: Chloride Analysis Run 12/17/2025 11:56 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

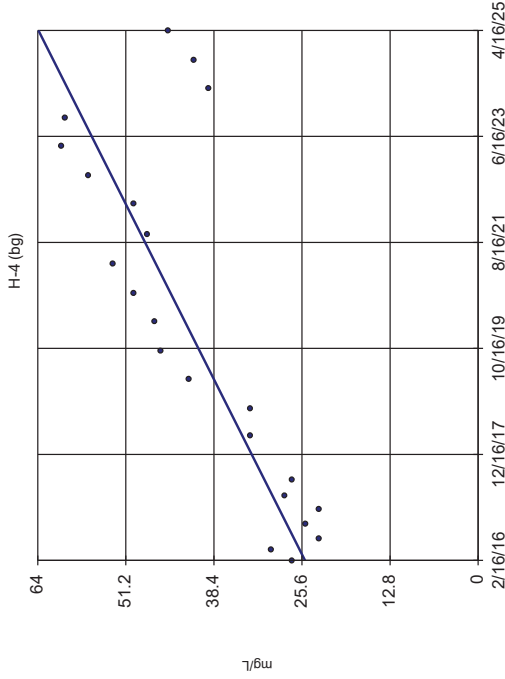
### Sen's Slope Estimator



Constituent: Chloride Analysis Run 12/17/2025 11:56 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

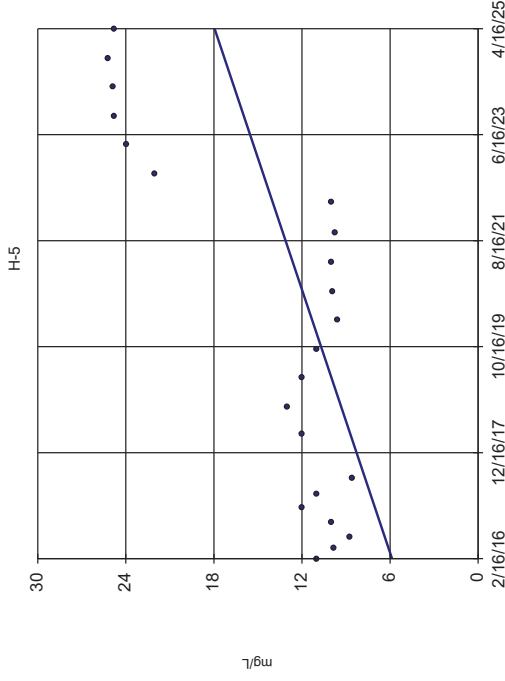
### Sen's Slope Estimator



n = 22  
 Slope = 4.224  
 units per year.  
 Mann-Kendall  
 statistic = 141  
 critical = 84  
 Increasing trend  
 significant at 98%  
 confidence level  
 ( $\alpha = 0.01$  per  
 tail).

Constituent: Chloride Analysis Run 12/17/2025 11:56 AM  
 Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### Sen's Slope Estimator

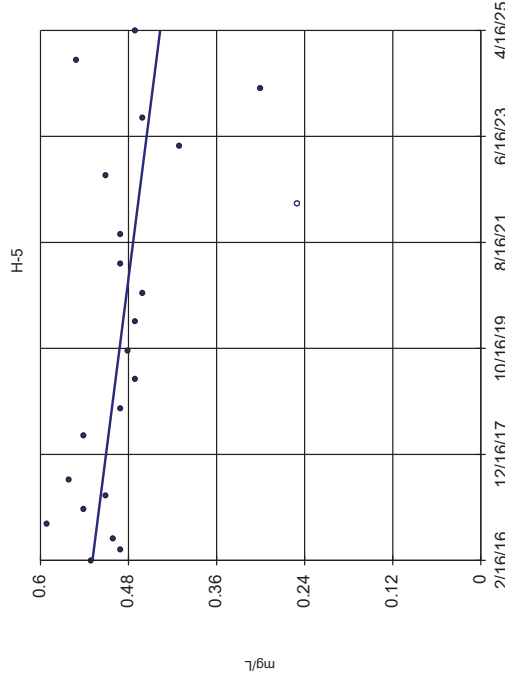


n = 22  
 Slope = 1.318  
 units per year.  
 Mann-Kendall  
 statistic = 101  
 critical = 84  
 Increasing trend  
 significant at 98%  
 confidence level  
 ( $\alpha = 0.01$  per  
 tail).

Constituent: Chloride Analysis Run 12/17/2025 11:56 AM  
 Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Follow symbols indicate censored values.

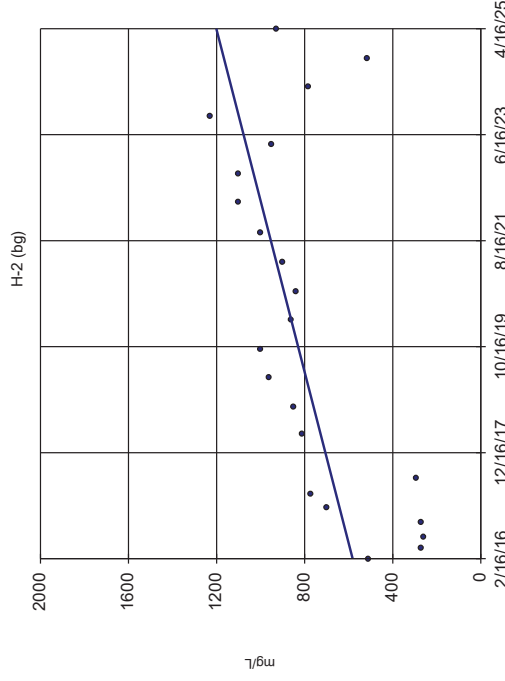
### Sen's Slope Estimator



n = 22  
 Slope = -0.01006  
 units per year.  
 Mann-Kendall  
 statistic = 91  
 critical = 84  
 Decreasing trend  
 significant at 98%  
 confidence level  
 ( $\alpha = 0.01$  per  
 tail).

Constituent: Fluoride Analysis Run 12/17/2025 11:56 AM  
 Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

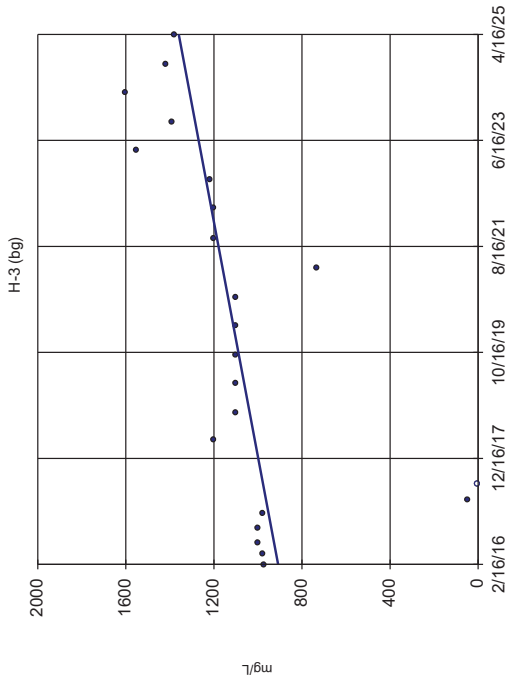
### Sen's Slope Estimator



n = 22  
 Slope = 67.57  
 units per year.  
 Mann-Kendall  
 statistic = 120  
 critical = 84  
 Increasing trend  
 significant at 98%  
 confidence level  
 ( $\alpha = 0.01$  per  
 tail).

Constituent: Sulfate Analysis Run 12/17/2025 11:56 AM  
 Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

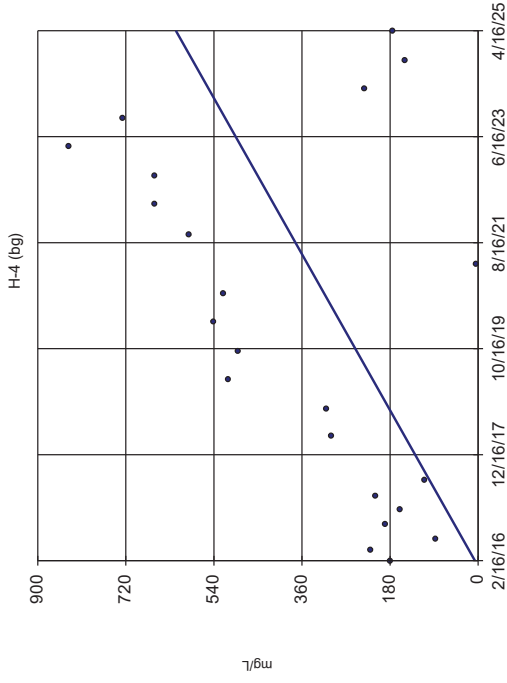
### Sen's Slope Estimator



Constituent: Sulfate Analysis Run 12/17/2025 11:56 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

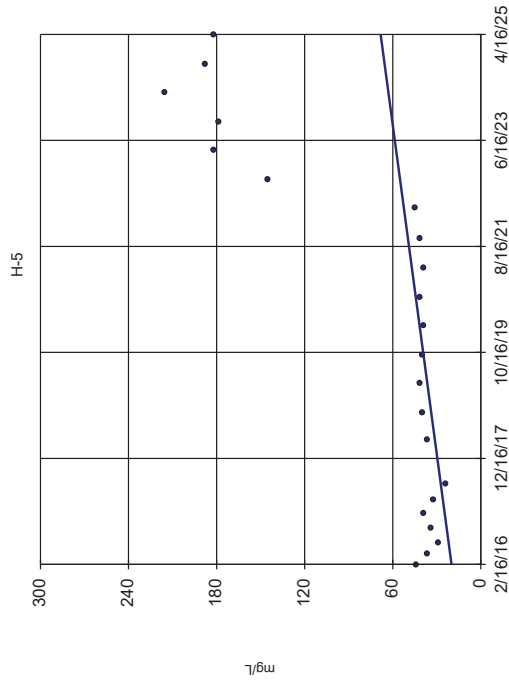
### Sen's Slope Estimator



Constituent: Sulfate Analysis Run 12/17/2025 11:56 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

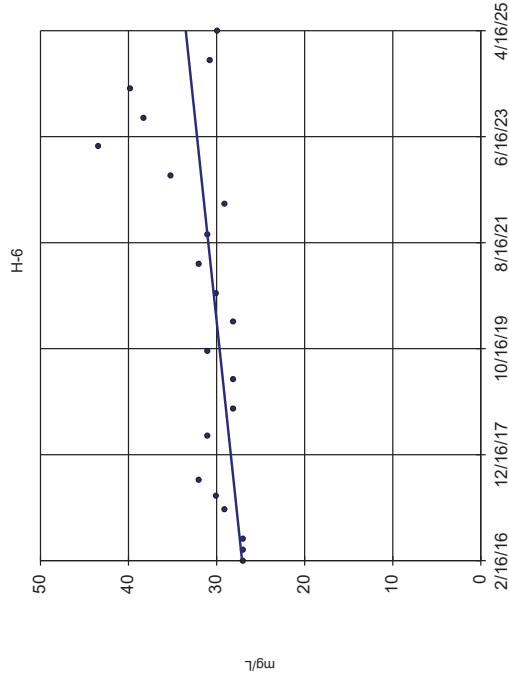
### Sen's Slope Estimator



Constituent: Sulfate Analysis Run 12/17/2025 11:56 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

### Sen's Slope Estimator

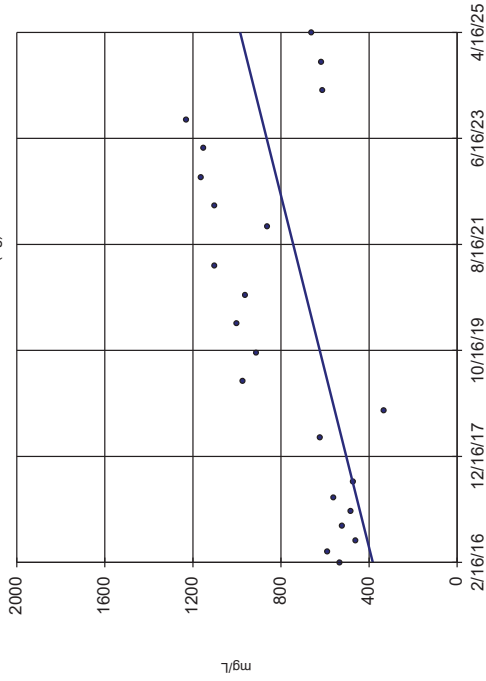


Constituent: Sulfate Analysis Run 12/17/2025 11:56 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

### Sen's Slope Estimator

H-4 (bg)



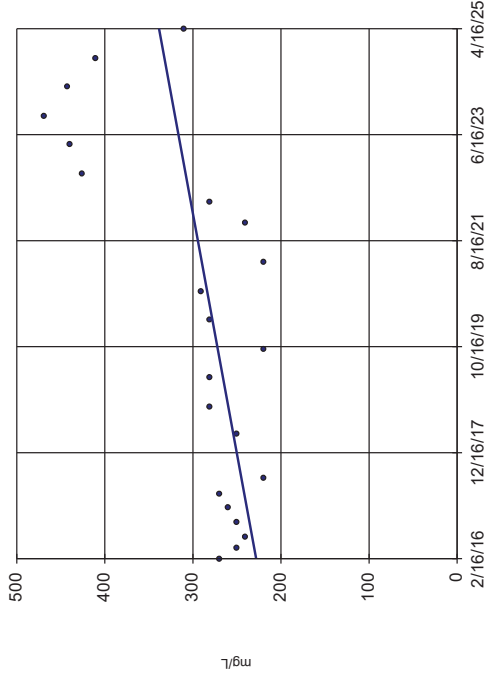
n = 22  
Slope = 65.66 units per year.  
Mann-Kendall statistic = 106  
critical = 84  
Increasing trend significant at 98% confidence level ( $\alpha = 0.01$  per tail).

Constituent: Total Dissolved Solids - Analysis Run 12/17/2025 11:56 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### Sen's Slope Estimator

H-5

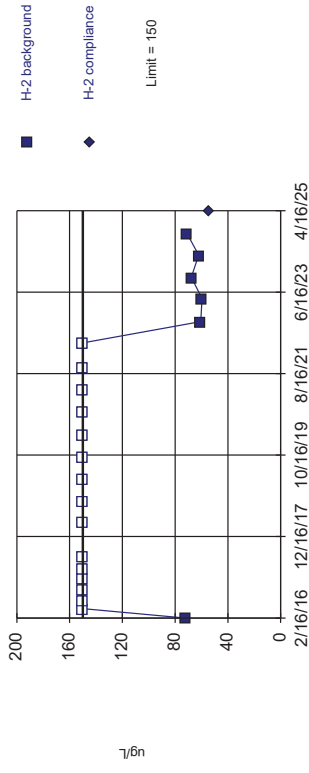


n = 22  
Slope = 12.02 units per year.  
Mann-Kendall statistic = 107  
critical = 84  
Increasing trend significant at 98% confidence level ( $\alpha = 0.01$  per tail).

Constituent: Total Dissolved Solids - Analysis Run 12/17/2025 11:56 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

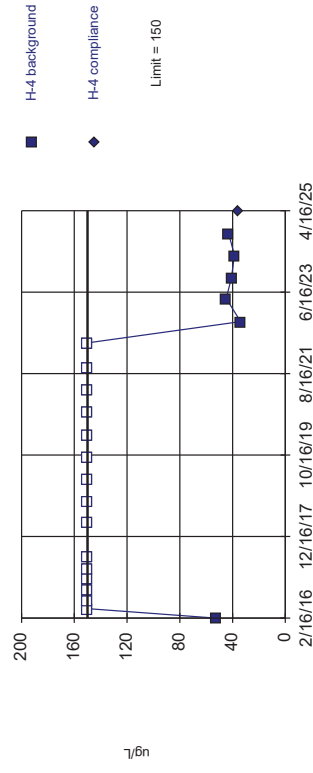
Within Limit  
Prediction Limit  
Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 21 background values. 71.43% NDs. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

Constituent: Boron And Borates Only Analysis Run 12/17/2025 11:40 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

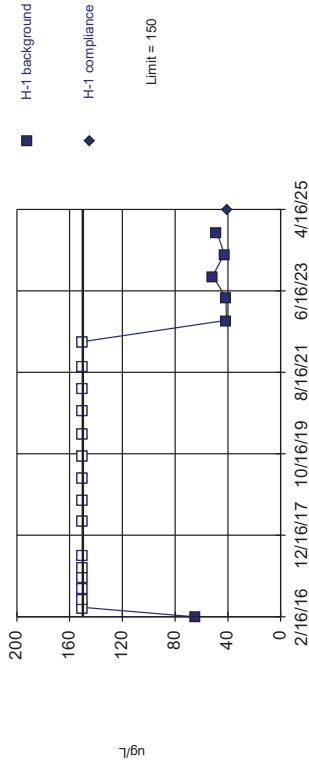
Within Limit  
Prediction Limit  
Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 21 background values. 71.43% NDs. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

Constituent: Boron And Borates Only Analysis Run 12/17/2025 11:40 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

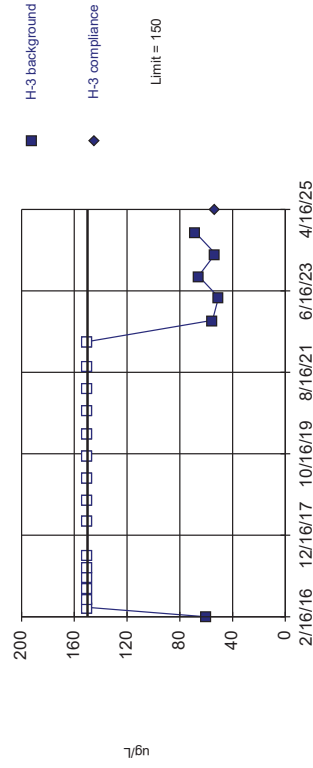
Within Limit  
Prediction Limit  
Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 21 background values. 71.43% NDs. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

Constituent: Boron And Borates Only Analysis Run 12/17/2025 11:40 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit  
Prediction Limit  
Intrawell Non-parametric



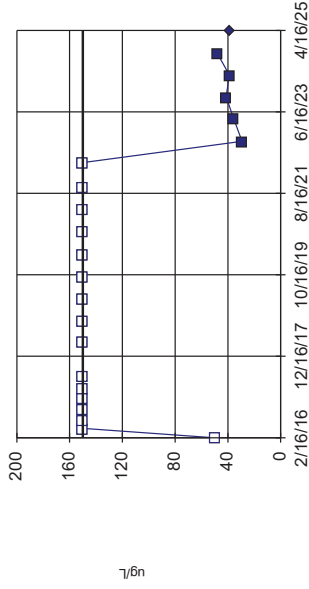
Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 21 background values. 71.43% NDs. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

Constituent: Boron And Borates Only Analysis Run 12/17/2025 11:40 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 21 background values. 76.19% NDS. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

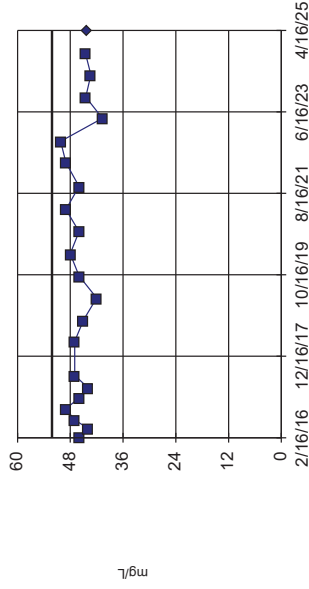
Constituent: Boron And Borates Only Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=45.92, Std. Dev.=2.409, n=21. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.9745, calculated = 0.9745, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

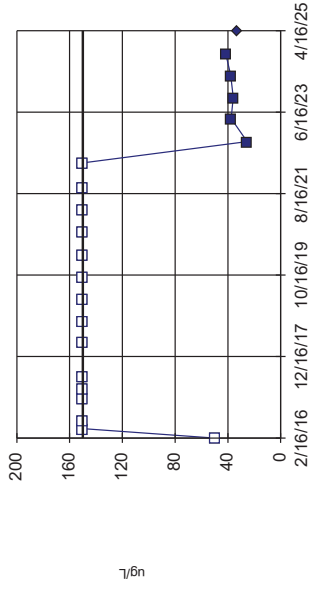
Constituent: Calcium Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 20 background values. 75% NDS. Report alpha = 0.04762. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

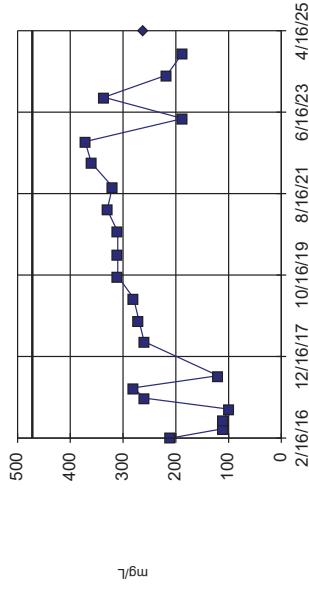
Constituent: Boron And Borates Only Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



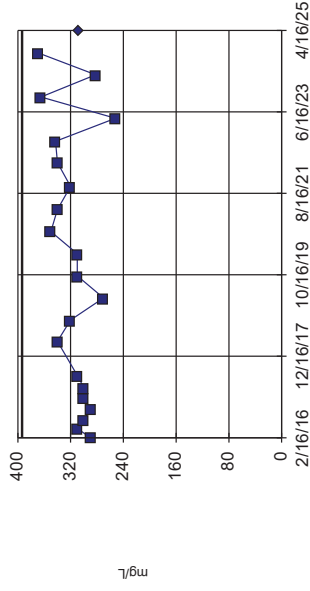
Background Data Summary: Mean=249.5, Std. Dev.=86.05, n=21. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.9192, calculated = 0.9192, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Calcium Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Parametric



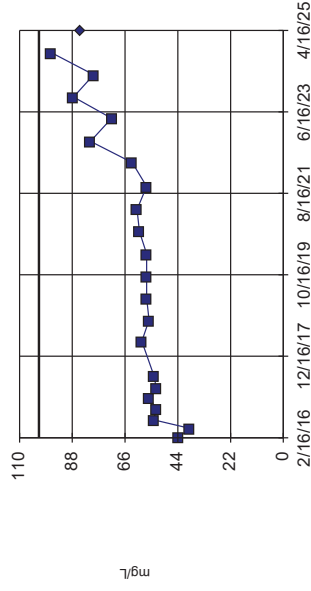
Background Data Summary: Mean=314.9, Std. Dev.=30.47, n=21. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9756, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Calcium Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Parametric



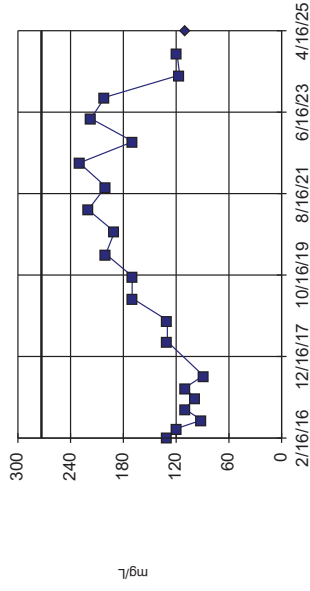
Background Data Summary (based on cube root transformation): Mean=3.931, Std. Dev.=0.2857, n=21. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9089, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Calcium Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Parametric



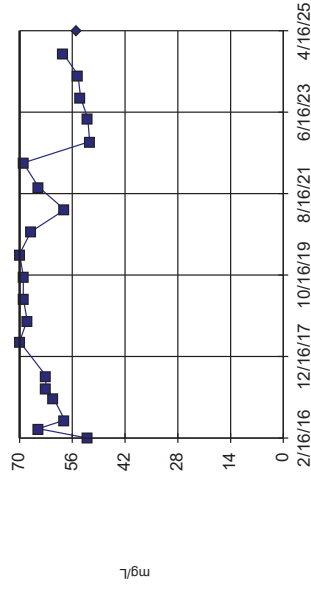
Background Data Summary: Mean=152.9, Std. Dev.=46.47, n=21. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9127, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Calcium Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 20 background values. Report alpha = 0.04762. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

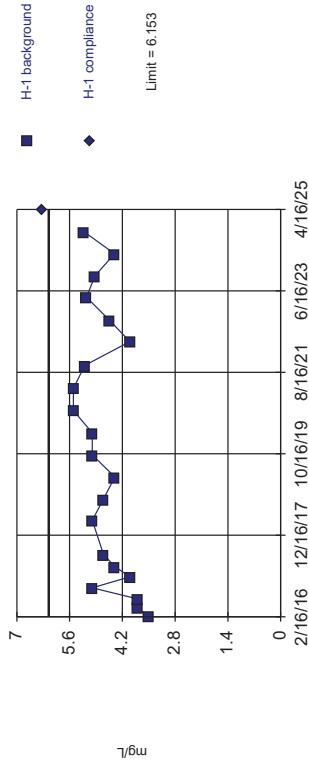
Constituent: Calcium Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Exceeds Limit

Prediction Limit

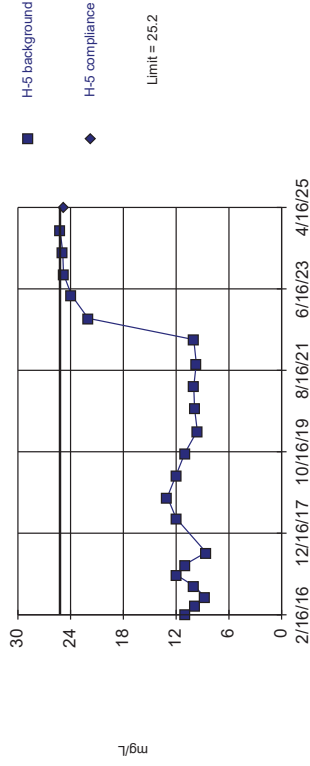
Intrawell Parametric



Within Limit

Prediction Limit

Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 21 background values. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality, data were not deseasonalized.

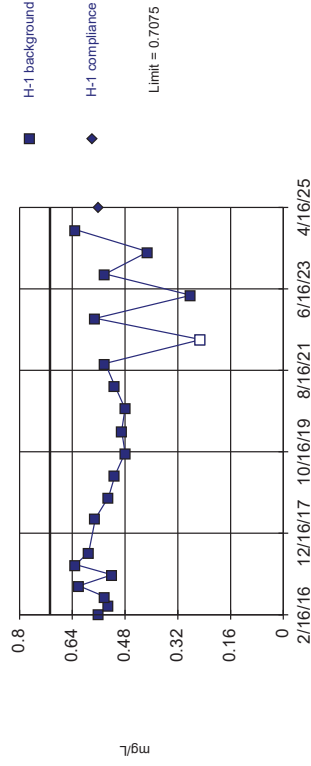
Constituent: Chloride Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary (based on square transformation): Mean=0.2727, Std. Dev.=0.08809, n=21, 4.762% NDs. Insufficient data to test for seasonality, data were not deseasonalized. Normality test, Shapiro Wilk @alpha = 0.05, calculated = 0.9084, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

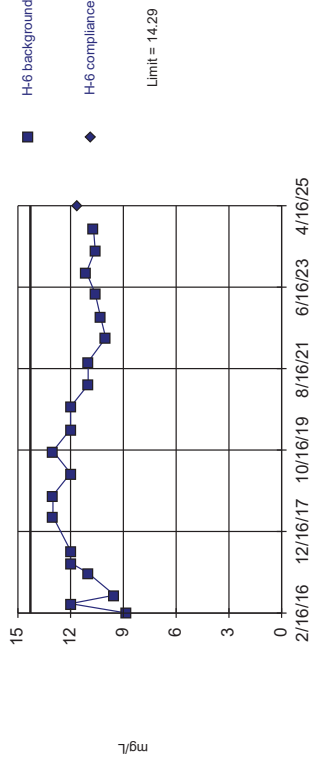
Constituent: Fluoride Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=11.28, Std. Dev.=1.157, n=20. Insufficient data to test for seasonality, data were not deseasonalized. Normality test, Shapiro Wilk @alpha = 0.05, calculated = 0.9461, critical = 0.905. Report alpha = 0.01. Most recent point compared to limit.

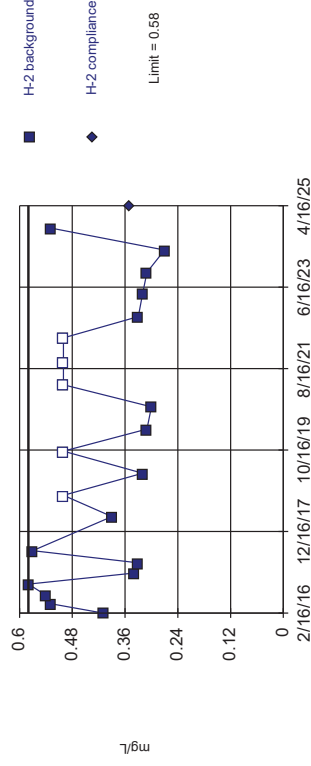
Constituent: Chloride Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 21 background values, 23.81% NDs. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality, data were not deseasonalized.

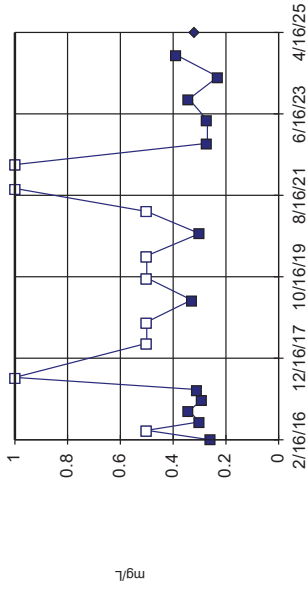
Constituent: Fluoride Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric



H-3 background

H-3 compliance

Limit = 1

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 21 background values. 42.86% NDs. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

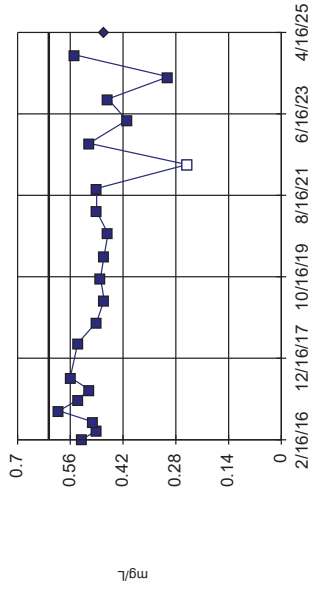
Constituent: Fluoride Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



H-5 background

H-5 compliance

Limit = 0.6171

Background Data Summary (based on cube transformation): Mean=0.1189, Std. Dev.=0.04489, n=21, 4.762% NDs. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9468, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

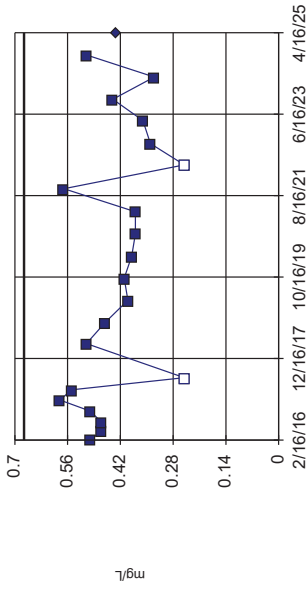
Constituent: Fluoride Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



H-4 background

H-4 compliance

Limit = 0.6757

Background Data Summary: Mean=0.431, Std. Dev.=0.0946, n=21, 9.524% NDs. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9635, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

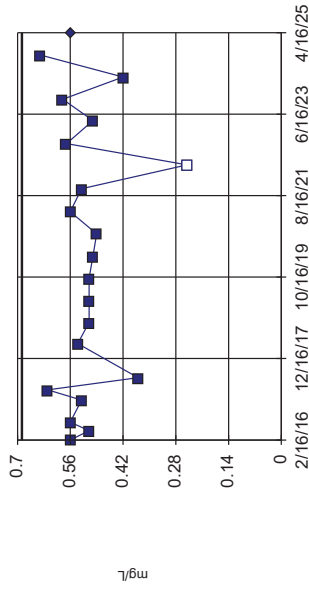
Constituent: Fluoride Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



H-6 background

H-6 compliance

Limit = 0.6885

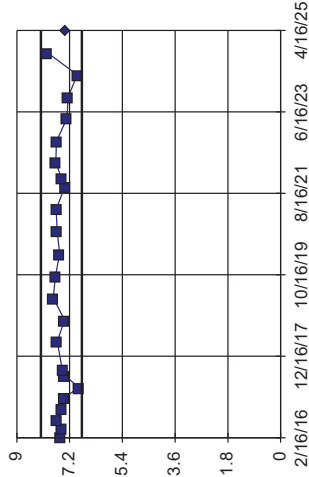
Background Data Summary (based on square transformation): Mean=0.2707, Std. Dev.=0.07816, n=20, 5% NDs. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9276, critical = 0.905. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Fluoride Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limits

Prediction Limit  
Intrawell Parametric



■ H-1 background  
◆ H-1 compliance  
Limit = 8.178  
Limit = 6.779

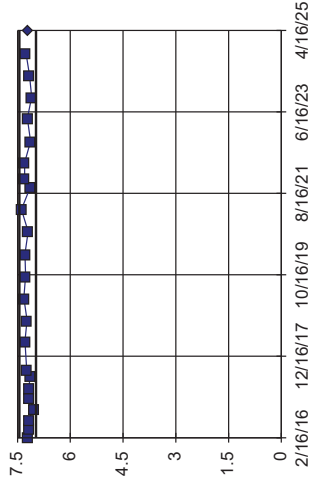
Background Data Summary: Mean=7.479, Std. Dev.=0.243, n=23. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9342, critical = 0.914. Report alpha = 0.01. Most recent point compared to limit.

Constituent: pH Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limits

Prediction Limit  
Intrawell Parametric



■ H-3 background  
◆ H-3 compliance  
Limit = 7.449  
Limit = 6.977

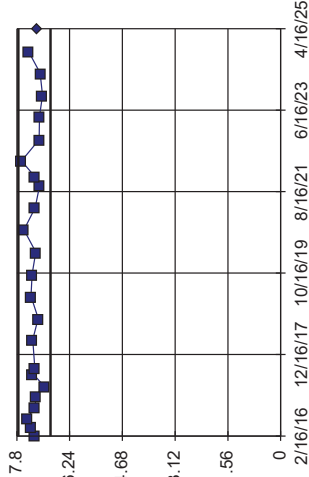
Background Data Summary: Mean=7.213, Std. Dev.=0.08188, n=23. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9855, critical = 0.914. Report alpha = 0.01. Most recent point compared to limit.

Constituent: pH Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limits

Prediction Limit  
Intrawell Parametric



■ H-2 background  
◆ H-2 compliance  
Limit = 7.756  
Limit = 6.906

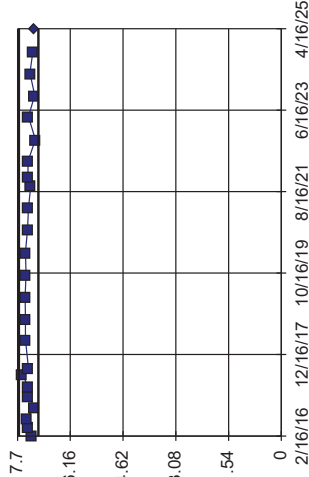
Background Data Summary: Mean=7.281, Std. Dev.=0.165, n=23. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9643, critical = 0.914. Report alpha = 0.01. Most recent point compared to limit.

Constituent: pH Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limits

Prediction Limit  
Intrawell Parametric



■ H-4 background  
◆ H-4 compliance  
Limit = 7.659  
Limit = 7.093

Background Data Summary: Mean=7.376, Std. Dev.=0.0982, n=23. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9367, critical = 0.914. Report alpha = 0.01. Most recent point compared to limit.

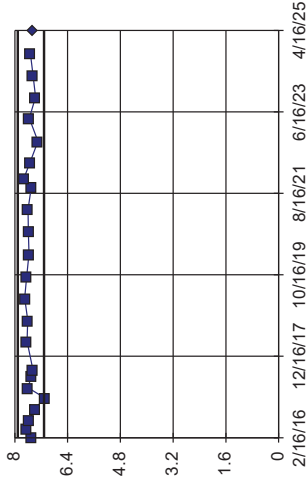
Constituent: pH Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limits

Prediction Limit

Intrawell Parametric



■ H-5 background  
 ◆ H-5 compliance  
 Limit = 7.913  
 Limit = 7.115

Background Data Summary (based on square transformation): Mean=56.61, Std. Dev.=2.082, n=23. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9162, critical = 0.914. Report alpha = 0.01. Most recent point compared to limit.

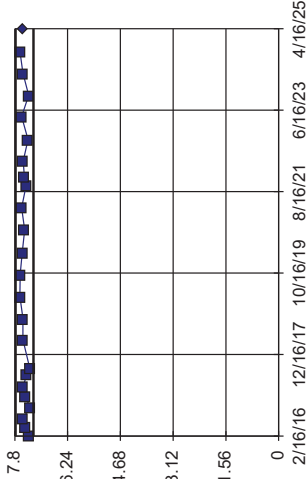
Constituent: pH Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limits

Prediction Limit

Intrawell Parametric



■ H-6 background  
 ◆ H-6 compliance  
 Limit = 7.781  
 Limit = 7.251

Background Data Summary: Mean=7.516, Std. Dev.=0.09199, n=23. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9405, critical = 0.914. Report alpha = 0.01. Most recent point compared to limit.

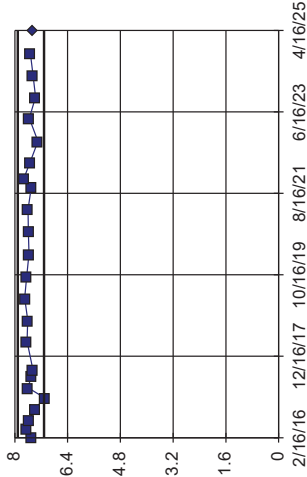
Constituent: pH Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limits

Prediction Limit

Intrawell Parametric



■ H-5 background  
 ◆ H-5 compliance  
 Limit = 7.913  
 Limit = 7.115

Background Data Summary (based on square transformation): Mean=56.61, Std. Dev.=2.082, n=23. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9162, critical = 0.914. Report alpha = 0.01. Most recent point compared to limit.

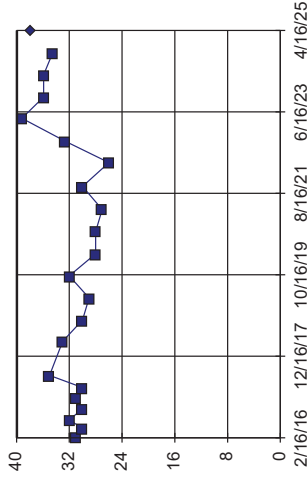
Constituent: pH Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



■ H-1 background  
 ◆ H-1 compliance  
 Limit = 39.94

Background Data Summary: Mean=31.43, Std. Dev.=3.287, n=21. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9641, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

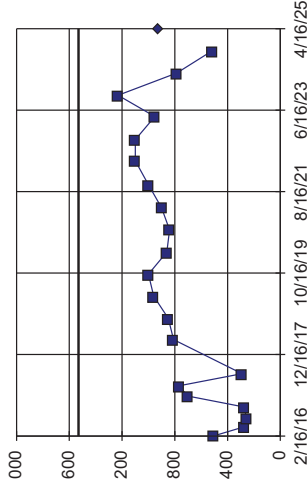
Constituent: Sulfate Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



■ H-2 background  
 ◆ H-2 compliance  
 Limit = 1530

Background Data Summary: Mean=760.7, Std. Dev.=297.3, n=21. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9113, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

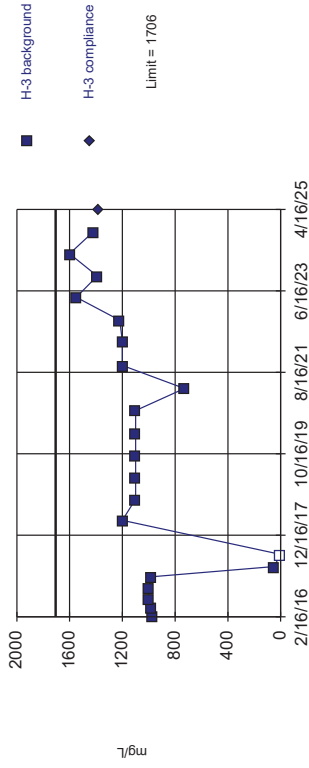
Constituent: Sulfate Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary (based on square transformation): Mean=1246024, Std. Dev.=643858, n=21, 4.762%  
NDS. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha =  
0.05, calculated = 0.9373, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

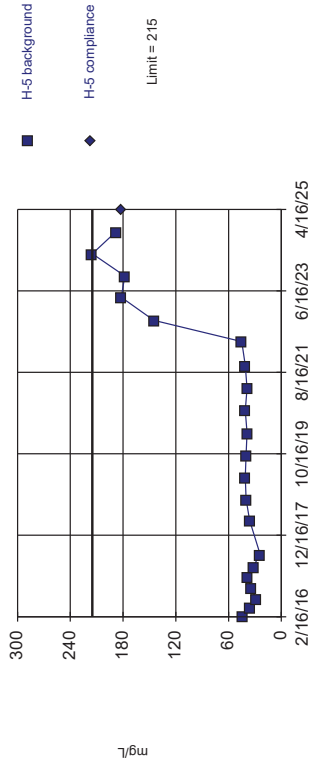
Constituent: Sulfate Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data  
to be non-normal at the 0.05 alpha level. Limit is highest of 21 background values. Report alpha = 0.04545. Most  
recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

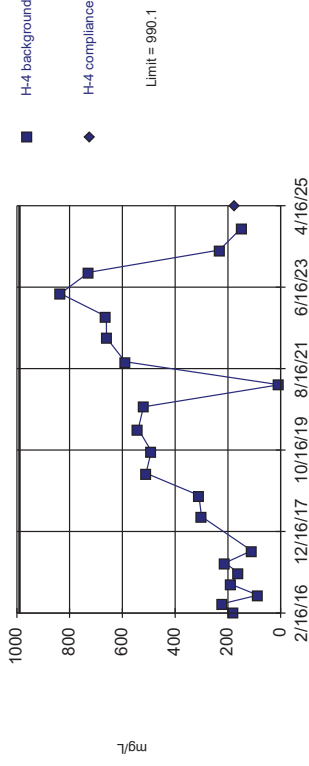
Constituent: Sulfate Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=365.9, Std. Dev.=241.3, n=21. Insufficient data to test for seasonality; data were  
not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9314, critical = 0.908. Report  
alpha = 0.01. Most recent point compared to limit.

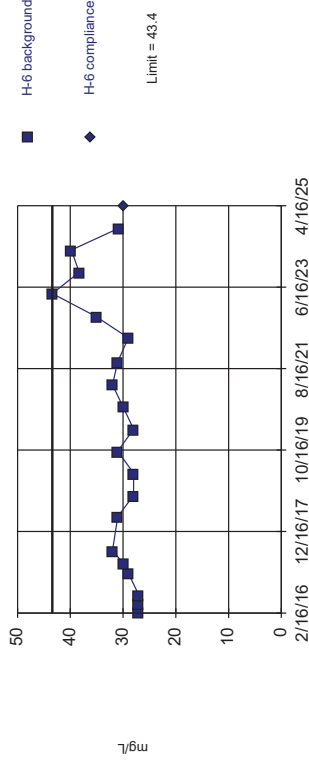
Constituent: Sulfate Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric



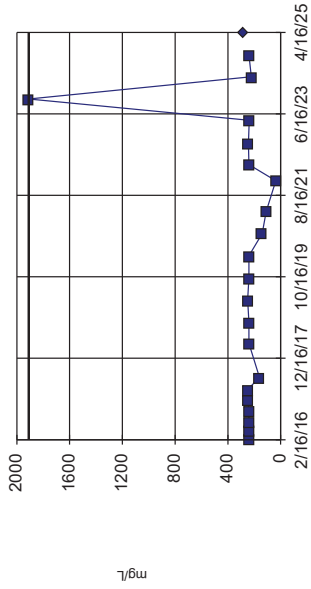
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data  
to be non-normal at the 0.05 alpha level. Limit is highest of 20 background values. Report alpha = 0.04762. Most  
recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

Constituent: Sulfate Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Non-parametric



■ H-1 background  
◆ H-1 compliance  
Limit = 1910

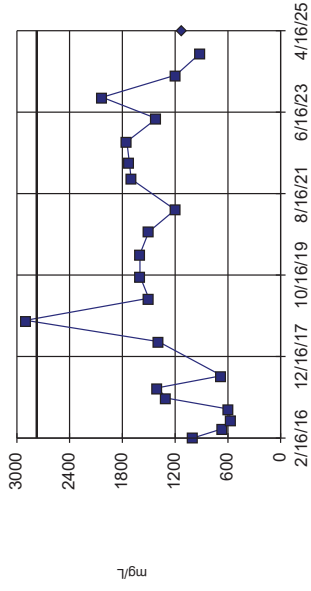
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 21 background values. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality, data were not deseasonalized.

Constituent: Total Dissolved Solids Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Parametric



■ H-2 background  
◆ H-2 compliance  
Limit = 2773

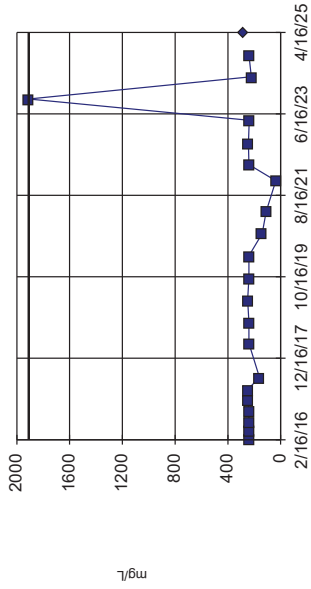
Background Data Summary: Mean=1361, Std. Dev.=545.5, n=21. Insufficient data to test for seasonality, data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9242, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Total Dissolved Solids Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Non-parametric



■ H-3 background  
◆ H-3 compliance  
Limit = 2147

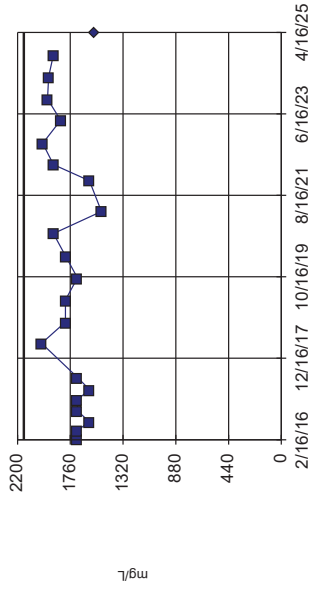
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 21 background values. Report alpha = 0.9474, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Total Dissolved Solids Analysis Run 12/17/2025 11:40 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

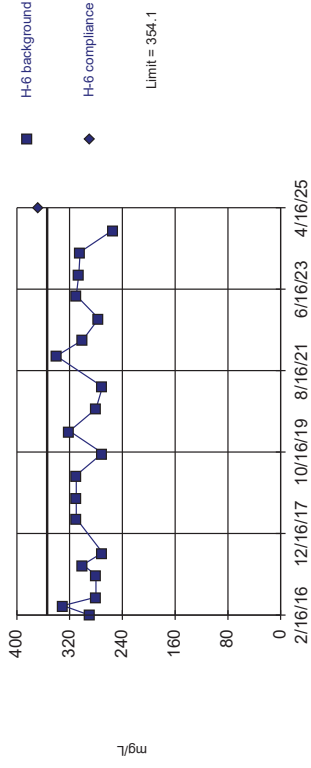
Prediction Limit  
Intrawell Parametric



Exceeds Limit

Prediction Limit

Intrawell Parametric



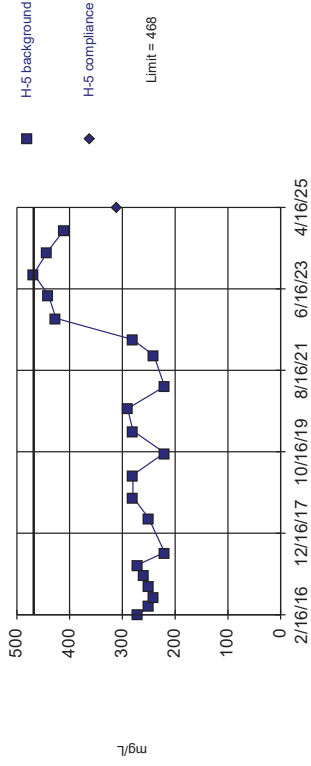
Background Data Summary: Mean=295.5, Std. Dev.=22.52, n=20. Insufficient data to test for seasonality, data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9632, critical = 0.905. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Total Dissolved Solids Analysis Run 12/17/2025 11:40 AM  
 Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

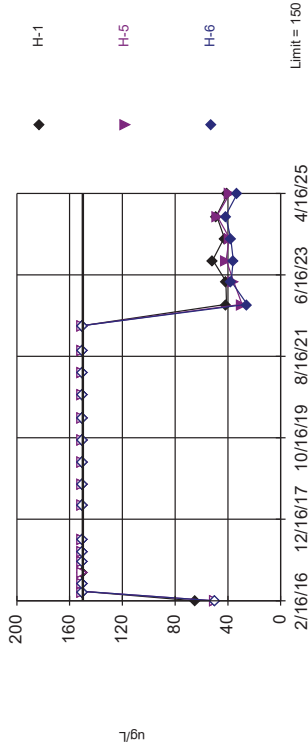
Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 21 background values. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality, data were not deseasonalized.

Constituent: Total Dissolved Solids Analysis Run 12/17/2025 11:40 AM  
 Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

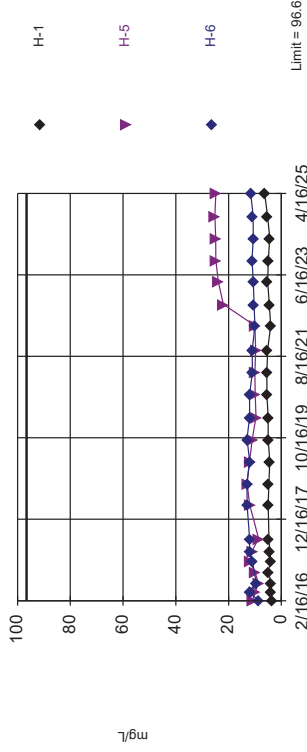
Within Limit  
Prediction Limit  
Interwell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 66 background values. Report alpha = 0.04348. Individual comparison alpha = 0.01471. Most recent point for each compliance well compared to limit. Seasonality was not detected with 95% confidence.

Constituent: Boron And Borates Only Analysis Run 12/17/2025 12:27 PM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

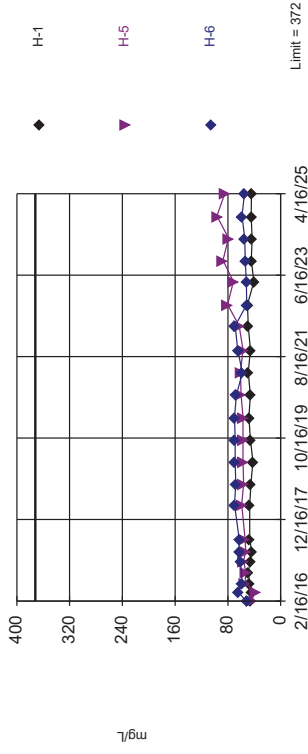
Within Limit  
Prediction Limit  
Interwell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Francia normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 66 background values. Report alpha = 0.04348. Individual comparison alpha = 0.01471. Most recent point for each compliance well compared to limit. Seasonality was not detected with 95% confidence.

Constituent: Chloride Analysis Run 12/17/2025 12:27 PM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

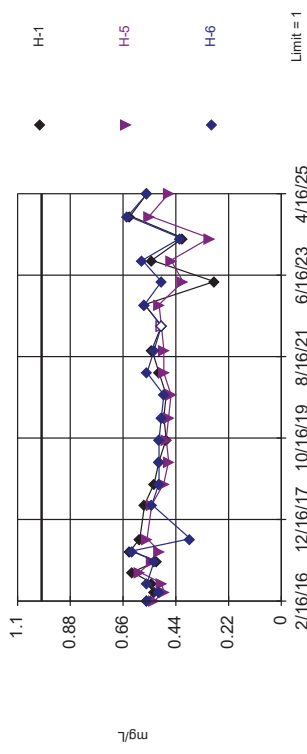
Within Limit  
Prediction Limit  
Interwell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Francia normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 66 background values. Report alpha = 0.04348. Individual comparison alpha = 0.01471. Most recent point for each compliance well compared to limit. Seasonality was not detected with 95% confidence.

Constituent: Calcium Analysis Run 12/17/2025 12:27 PM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit  
Prediction Limit  
Interwell Non-parametric

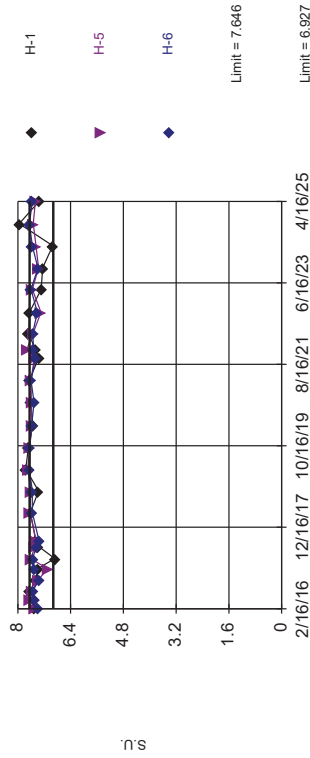


Non-parametric test used in lieu of parametric prediction limit because the Shapiro Francia normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 66 background values. 24.24% NDs. Report alpha = 0.04348. Individual comparison alpha = 0.01471. Most recent point for each compliance well compared to limit. Seasonality was not detected with 95% confidence.

Constituent: Fluoride Analysis Run 12/17/2025 12:27 PM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limits

Prediction Limit  
Interwell Parametric



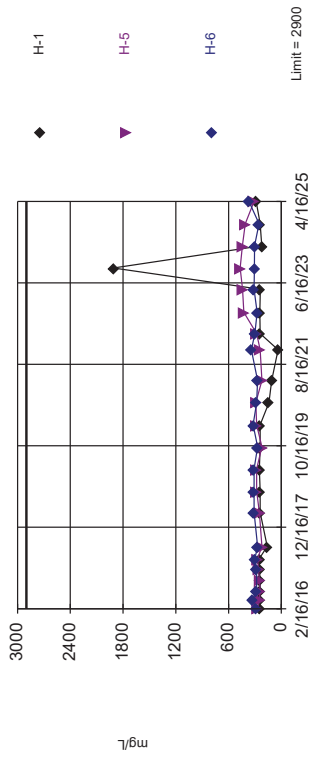
Background Data Summary: Mean=7.286, Std. Dev.=0.1348, n=72. Seasonality was not detected with 95% confidence. Normality test: Shapiro Francia @alpha = 0.05, calculated = 0.9844, critical = 0.968. Report alpha = 0.0297. Individual comparison alpha = 0.005. Most recent point for each compliance well compared to limit.

Constituent: pH Analysis Run 12/17/2025 12:27 PM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit  
Interwell Non-parametric



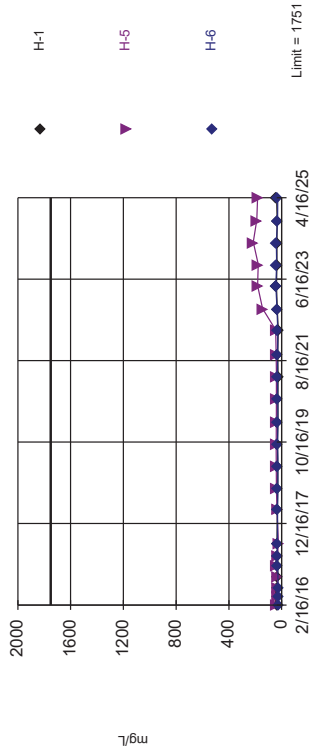
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Francia normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 66 background values. Report alpha = 0.04348. Individual comparison alpha = 0.01471. Most recent point for each compliance well compared to limit. Seasonality was not detected with 95% confidence.

Constituent: Total Dissolved Solids Analysis Run 12/17/2025 12:27 PM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit  
Interwell Parametric



Background Data Summary: Mean=729.2, Std. Dev.=425.3, n=66, 1.515% NDs. Seasonality was not detected with 95% confidence. Normality test: Shapiro Francia @alpha = 0.05, calculated = 0.9672, critical = 0.965. Report alpha = 0.0297. Individual comparison alpha = 0.01. Most recent point for each compliance well compared to limit.

Constituent: Sulfate Analysis Run 12/17/2025 12:27 PM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

**ATTACHMENT 5**

**FIELD DATA SHEETS**

**SUNFLOWER ELECTRIC POWER CORPORATION  
HOLCOMB STATION INDUSTRIAL LANDFILL  
SOLID WASTE PERMIT NO. 420  
WELL DATA**

WELL ID	DATE	TIME	TOC <sup>1</sup> (Elevation, FT-MSL)	DTW <sup>2</sup> (Feet)	SWL <sup>3</sup> (Elevation FT-MSL)	WELL T.D. <sup>4</sup>
H1	4/16/2025	9:28	2,924.54	230	2,694.54	2638.93
H2	4/16/2025	9:51	2,914.71	212.5	2,702.21	2622.18
H3	4/16/2025	10:04	2,905.93	204	2,701.93	2632.16
H4	4/16/2025	10:18	2,901.66	203.4	2,698.26	2635.04
H5	4/16/2025	10:53	2,896.67	199.5	2,697.17	2637.14
H6	4/16/2025	10:36	2,940.37	247.9	2,692.47	2642.48
SS1	4/16/2025	9:40	2,923.93	90.7	2,833.23	2812.01
DD3	4/16/2025	9:45	2,941.22	128.4	2,812.82	2779.09
S4	4/16/2025	10:31	2,946.17	96.7	2,849.47	2813.47
<b>BASIN</b>						

<sup>1</sup>TOC = Top of casing - plant datum; all wells surveyed by a licensed professional land surveyor (Cornerstone) in March 2006 and July 2008

<sup>2</sup>DTW = Depth to water - measurements are to be taken before placing hydrasleeve in well.

<sup>3</sup>SWL = Static water level = TOC elevation - DTW

<sup>4</sup>Well total depth is measured unless noted by (\*) which indicates a depth based on well consumption report.

Well inspection observations: (pad condition, security, etc.) See attached inspection sheet

SAMPLE COLLECTOR(S): Kandi George

<b>SUNFLOWER ELECTRIC POWER CORPORATION                      HOLCOMB STATION INDUSTRIAL LANDFILL                      SOLID WASTE PERMIT NO. 420                      SAMPLE COLLECTION DATA</b>						
WELL ID	DATE	TIME	CONDUCTIVITY	TURBIDITY	pH	TEMP (F)
H1	4/16/2025	9:28	412.8	1.1	7.36	63.3
H2	4/16/2025	9:51	1638	12.7	7.2	63.6
H3	4/16/2025	10:04	2455	8.78	7.2	63.4
H4	4/16/2025	10:18	919.9	1.54	7.2	63.4
H5	4/16/2025	10:53	618.5	0.9	7.47	62.6
H6	4/16/2025	10:36	461.4	2.4	7.56	62.8

pH, Conductivity, Turbidity and Temperature will be recorded using sample from hydrasleeve

Weather conditions (air temp, precipitation, wind direction): Sunny, 60-66°F, 0 precipitation, Wind SW 14-16 mph

Unusual conditions and deficiencies, equipment malfunctions, etc.: Temperature & pH taken in the field, conductivity & turbidity tested in HLS lab

SAMPLE COLLECTOR(S): Rob Bennet - pH, temp, conductivity, turbidity  
 Kandi George - Samples sent to lab

**LANDFILL MONITORING WELLS  
SEMI-ANNUAL INSPECTION LOG**

DATE: 04/16/2025 \_\_\_\_\_

Well Casing	Concrete Pad	Protection Riser	Locking Device \ Condition	Casing Plug / Cap																																																																																										
<table border="1" style="width: 100%; text-align: center;"> <tr><td>SS1</td><td>X</td></tr> <tr><td>S4</td><td>X</td></tr> <tr><td>DD3</td><td>X</td></tr> <tr><td>H1</td><td>X</td></tr> <tr><td>H2</td><td>X</td></tr> <tr><td>H3</td><td>X</td></tr> <tr><td>H4</td><td>X</td></tr> <tr><td>H5</td><td>X</td></tr> <tr><td>H6</td><td>X</td></tr> </table>	SS1	X	S4	X	DD3	X	H1	X	H2	X	H3	X	H4	X	H5	X	H6	X	<table border="1" style="width: 100%; text-align: center;"> <tr><td>SS1</td><td>X</td></tr> <tr><td>S4</td><td>X</td></tr> <tr><td>DD3</td><td>X</td></tr> <tr><td>H1</td><td>X</td></tr> <tr><td>H2</td><td>X</td></tr> <tr><td>H3</td><td>X</td></tr> <tr><td>H4</td><td>X</td></tr> <tr><td>H5</td><td>X</td></tr> <tr><td>H6</td><td>X</td></tr> </table>	SS1	X	S4	X	DD3	X	H1	X	H2	X	H3	X	H4	X	H5	X	H6	X	<table border="1" style="width: 100%; text-align: center;"> <tr><td>SS1</td><td>X</td></tr> <tr><td>S4</td><td>X</td></tr> <tr><td>DD3</td><td>X</td></tr> <tr><td>H1</td><td>X</td></tr> <tr><td>H2</td><td>X</td></tr> <tr><td>H3</td><td>X</td></tr> <tr><td>H4</td><td>X</td></tr> <tr><td>H5</td><td>X</td></tr> <tr><td>H6</td><td>X</td></tr> </table>	SS1	X	S4	X	DD3	X	H1	X	H2	X	H3	X	H4	X	H5	X	H6	X	<table border="1" style="width: 100%; text-align: center;"> <tr><td>SS1</td><td>X</td></tr> <tr><td>S4</td><td>X</td></tr> <tr><td>DD3</td><td>X</td></tr> <tr><td>H1</td><td>X</td></tr> <tr><td>H2</td><td>X</td></tr> <tr><td>H3</td><td>X</td></tr> <tr><td>H4</td><td>X</td></tr> <tr><td>H5</td><td>X</td></tr> <tr><td>H6</td><td>X</td></tr> </table>	SS1	X	S4	X	DD3	X	H1	X	H2	X	H3	X	H4	X	H5	X	H6	X	<table border="1" style="width: 100%; text-align: center;"> <tr><td>SS1</td><td>X</td></tr> <tr><td>S4</td><td>X</td></tr> <tr><td>DD3</td><td>X</td></tr> <tr><td>H1</td><td>X</td></tr> <tr><td>H2</td><td>X</td></tr> <tr><td>H3</td><td>X</td></tr> <tr><td>H4</td><td>X</td></tr> <tr><td>H5</td><td>X</td></tr> <tr><td>H6</td><td>X</td></tr> </table>	SS1	X	S4	X	DD3	X	H1	X	H2	X	H3	X	H4	X	H5	X	H6	X
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H6	X																																																																																													

**Comments:** All well casings, concrete pads, and protection risers in good condition except on well #DD3. This well is missing the lock and the protection riser will not close completely because the well casing inside is taller than the riser. The casing is plugged with a cap inside the protection riser.

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Inspected by: Kandi George #1009 Signature

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 04/10/25 9:28a

WELL I.D. H1 STATIC DEPTH 230'

LOCATION: HOLCOMB STATION CCR LANDFILL

ANALYSIS: CCR, APPENDIX III PARAMETERS

ALL DEVICES CALIBRATED Y OPER RB

pH 7.36 CONDUCTIVITY 42.8

TURBIDITY 1.10 TEMPERATURE 63.3

AMBIENT TEMP/CONDITIONS 60°F  
Sunny Wind SW 16mph

COMMENTS \_\_\_\_\_

SAMPLED BY K George

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 04/16/25, 9:51

WELL I.D. H2 STATIC DEPTH 212.5

LOCATION: HOLCOMB STATION CCR LANDFILL

ANALYSIS: CCR, APPENDIX III PARAMETERS

ALL DEVICES CALIBRATED Y OPER RB

pH 7.20 CONDUCTIVITY ~~103~~ <sup>163</sup> 1638

TURBIDITY 12.7 TEMPERATURE 63.6

AMBIENT TEMP/CONDITIONS 62°F  
Sunny Wind SW 16 mph

COMMENTS \_\_\_\_\_

SAMPLED BY K. George

*Print in the Rain*

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 04/10/25, 10:04

WELL I.D. H3 STATIC DEPTH 204

LOCATION: **HOLCOMB STATION CCR LANDFILL**

ANALYSIS: **CCR, APPENDIX III PARAMETERS**

ALL DEVICES CALIBRATED Y OPER RB

pH 7.20 CONDUCTIVITY 2455

TURBIDITY 8.78 TEMPERATURE 63.4

AMBIENT TEMP/CONDITIONS 64° F  
Sunny Wind SW 15 mph

COMMENTS \_\_\_\_\_

SAMPLED BY Kgeorge

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 04/16/2025 10:18

WELL I.D. H4 STATIC DEPTH 203.4

LOCATION: **HOLCOMB STATION CCR LANDFILL**

ANALYSIS: **CCR, APPENDIX III PARAMETERS**

ALL DEVICES CALIBRATED y OPER RB

pH 7.20 CONDUCTIVITY 919.9

TURBIDITY 1.54 TEMPERATURE 63.4

AMBIENT TEMP/CONDITIONS 64° F

Sunny Wind SW 15 mph

COMMENTS \_\_\_\_\_

SAMPLED BY K George

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 04/16/25, 10:53

WELL I.D. H5 STATIC DEPTH 199.5

LOCATION: HOLCOMB STATION CCR LANDFILL

ANALYSIS: CCR, APPENDIX III PARAMETERS

ALL DEVICES CALIBRATED Y OPER RB

pH 7.47 CONDUCTIVITY 618.5

TURBIDITY 0.90 TEMPERATURE 62.6

AMBIENT TEMP/CONDITIONS 68° F  
Sunny Wind ~~SE~~ SW 14mph

COMMENTS \_\_\_\_\_

SAMPLED BY K George

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 04/16/25 , 10:36

WELL I.D. H6 STATIC DEPTH 247.9

LOCATION: **HOLCOMB STATION CCR LANDFILL**

ANALYSIS: **CCR, APPENDIX III PARAMETERS**

ALL DEVICES CALIBRATED Y OPER RB

pH 7.56 CONDUCTIVITY 461.4

TURBIDITY 2.40 TEMPERATURE 62.8

AMBIENT TEMP/CONDITIONS 66°F  
Sunny Wind SW 15mph

COMMENTS \_\_\_\_\_

SAMPLED BY K George

**APPENDIX E**

**FALL 2025 GROUNDWATER MONITORING REPORT**



December 4, 2025

Revised December 19, 2025

Sunflower Electric Power Corporation  
PO Box 1020  
Hays, Kansas 67601

Attention: Ms. Emily Vsetecka, P.E.  
Manager, Environmental and  
Laboratory Services

via email: [evsetecka@sunflower.net](mailto:evsetecka@sunflower.net)

Reference: Holcomb Common Facilities Industrial Landfill (CCR Unit)  
Fall 2025 Sampling Summary Report Revised  
AEC File No.25002-2:4908

Dear Ms. Vsetecka:

Sunflower has completed the sampling for the Fall 2025 Sampling Event, and this letter reports the validated results. Enclosed with this letter are the groundwater flow map, the chemical laboratory reports, and the statistical analysis. Our qualified groundwater scientist and the project engineer have reviewed this report, as indicated by the signatures below.

#### **Deviations from SAP**

Sunflower did not report deviations from procedures established in the Sampling and Analysis Plan (SAP) submitted to the Kansas Department of Health and Environment (KDHE) on June 23, 2016. However, Sunflower has elected to add interwell prediction limit analysis to the statistics completed to date due to changes in upgradient groundwater quality as described in the Alternate Source Determination (ASD) dated September 18, 2023, and revised February 9, 2024.

#### **Groundwater Flow**

Figure 1 in Attachment 1 shows groundwater elevations and contours converted from static water measurements recorded during the sampling event. Attachment 2 shows the related water level measurements. The general direction of groundwater flow is south-southeast in the northern portion of the landfill while the southern component of flow appears to be to the south to southwest. The groundwater gradient between H-1 and H-2 was 0.0037 feet per foot during this event.

#### **Chemical Data Summary**

Sunflower collected groundwater samples for each well using disposable HydraSleeve devices and decanted them into laboratory-supplied containers. Sunflower labeled all containers before placing on ice for shipment to the analytical laboratory under chain-of-custody protocol. Sunflower submitted the samples to ALS Laboratory Group, located in Houston, Texas.

Attachment 2 presents the analytical summary table showing detected analytes. Attachment 3 provides the complete laboratory report. Data validation shows that the data satisfies the quality control standards required in the Sampling and Analysis Plan (SAP).

**SUMMARY OF STATISTICAL ANALYSES RESULTS**

In accordance with the SAP and per the regulatory requirements of 40 CFR 257.93, statistical analysis was performed using the Sanitas Technologies Statistical software to evaluate the data. The statistical methods employed include Outlier Analysis, Time Series, Intrawell Prediction Limits and Interwell Prediction Limits Analysis to evaluate each parameter detected in the Sunflower monitoring wells. The specific methods and results are described below.

**Outlier Analysis** identifies anomalous values in the dataset. In this case, Outlier analysis (EPA 1989 Outlier Test) for each parameter is applied to indicate significant variations from the background levels. In many cases, these outlier values can graphically illustrate suspect values that may be attributed to sampling or laboratory error. In other cases, Outlier analysis can be used to aid in the verification of a statistically significant result if other factors can be ruled out. Attachment 4 includes the related Outlier output. As shown therein, multiple samples and constituents were flagged as potential outliers in the data set. AEC reviewed the outliers shown in Table 1 and elected to retain the values due to consistency in results among the constituents and increasing trends.

**Table 1: Detected Outliers**

Parameter	Well	Date
Fluoride	H-1	4/26/2022
		4/25/2023
		4/17/2024
		10/15/2025
	H-5	4/26/2022
		4/17/2024
	H-6	7/12/2017
		4/26/2022
		4/17/2024
pH	H-5	1/19/2017
Sulfate	H-3	4/4/2017
		7/12/2017
	H-4	4/6/2021
Total Dissolved Solids	H-6	10/15/2025

**Time Series Analysis** is performed to determine changes in analytical results over time. Time Series graphs were developed for each analyte detected in each well. These graphs produce observational evidence to evaluate if analyte concentrations are increasing or decreasing in each well. Attachment 4 includes the related Time Series output.

**Trend Analysis** was performed utilizing Sen’s Slope/Mann-Kendall analysis at 95% confidence to evaluate statistically significant trends in upgradient and downgradient wells. Table 2 shows the Wells/Parameter pairs that exhibit trends. Given the magnitude of trends, no background data was removed for statistical analysis as the sample size would be low for many of the observed parameters at n<14 or 15.

**Table 2: Trend Analysis**

Parameter (trend)	Well	Well Type
Boron (decreasing)	H-1	Side-gradient
	H-2	Upgradient
	H-4	Upgradient
	H-5	Side-gradient
	H-6	Downgradient
Calcium (increasing)	H-5	Side-gradient
Chloride (increasing)	H-1	Side-gradient
	H-3	Upgradient
	H-4	Upgradient
	H-5	Side-gradient
Fluoride (decreasing)	H-5	Side-gradient
Sulfate (increasing)	H-2	Upgradient
	H-3	Upgradient
	H-5	Side-gradient
Total Dissolved Solids (increasing)	H-4	Upgradient
	H-5	Side-gradient

**Intrawell Prediction Limit Analysis** is one of the statistical methods recommended by the EPA's Unified Guidance, Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities for facilities involved in compliance monitoring. A Statistically Significant Increase (SSI) is noted when the parameter value from a compliance well exceeds the Prediction Limit for that parameter.

As described in Section 6.2.3 of the Sunflower SAP, Intrawell Prediction Limits (see Attachment 4) are employed only after it has been demonstrated that there has been no prior facility impact on the background data. For certain wells, the data was non-normally distributed requiring non-parametric (vs. parametric) analysis; this will likely change with increases in the sample size. As noted on the graphs in Attachment 4, when the non-parametric test is used, the calculated limit is equal to the highest background value for that parameter. Since there is a relatively small number of observations to date, the limit may be artificially low. Finally, due to the relatively small sample size, seasonality effects will not be able to be determined until 20 observations are available (i.e., n=20).

As shown on the Intrawell Prediction Limit charts in Attachment 4, the compliance value for the following wells/parameters are shown to be above the predicted limits and therefore represent SSIs above background. Parameter values in compliance wells are well below upgradient values.

**Table 3: Intrawell Statistically Significant Increases (SSIs)**

Well	Parameter	Well Type
H-5	Total Dissolved Solids	Side-gradient / Compliance
H-6	Total Dissolved Solids	Downgradient

The Facility Alternate Source Demonstration (ASD) shows that there is an alternate source for the parameters with intrawell SSIs in Site Compliance Wells. It is expected that concentrations of parameters in down-gradient compliance wells will eventually be similar to the elevated concentrations found in up-gradient background wells. Sunflower therefore relied on interwell analysis to determine if the SSIs found via intrawell analysis were indicative of a release or influences from upgradient groundwater quality. The flagged well/parameter pairs utilizing intrawell analysis were not shown as SSIs utilizing interwell analysis.

**Interwell Prediction Limit Analysis:** In accordance with Section 6.2.5 of the Sunflower SAP, Sunflower elected to run Interwell Prediction Limit Analysis on the three (3) site Compliance wells. In lieu of the Tolerance Limit test outlined in the SAP, Sunflower utilized a Prediction Limit analysis at the 95% confidence level. With the pooled background data, seasonality was able to be tested but was not detected for any parameters in compliance wells.

As shown on the Interwell Prediction Limit charts none of the compliance values for the above, or any of the wells/parameters are shown to be above the predicted limits.

Sunflower will continue with routine monitoring to determine if future statistical analyses indicate a potential release from the landfill. Should you have any questions or comments concerning the results of this investigation, please contact our office at your convenience.

Sincerely,

**ALLIED ENVIRONMENTAL CONSULTANTS, INC.**



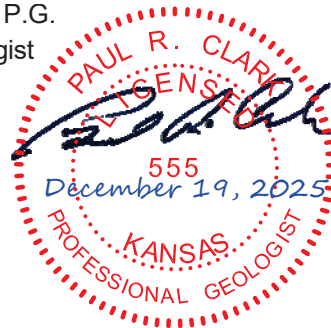
Sheena M Bruner  
Statistical Analyst



Paul R. Clark, P.G.  
Project Geologist



Ted Francis, P.E.  
Project Engineer

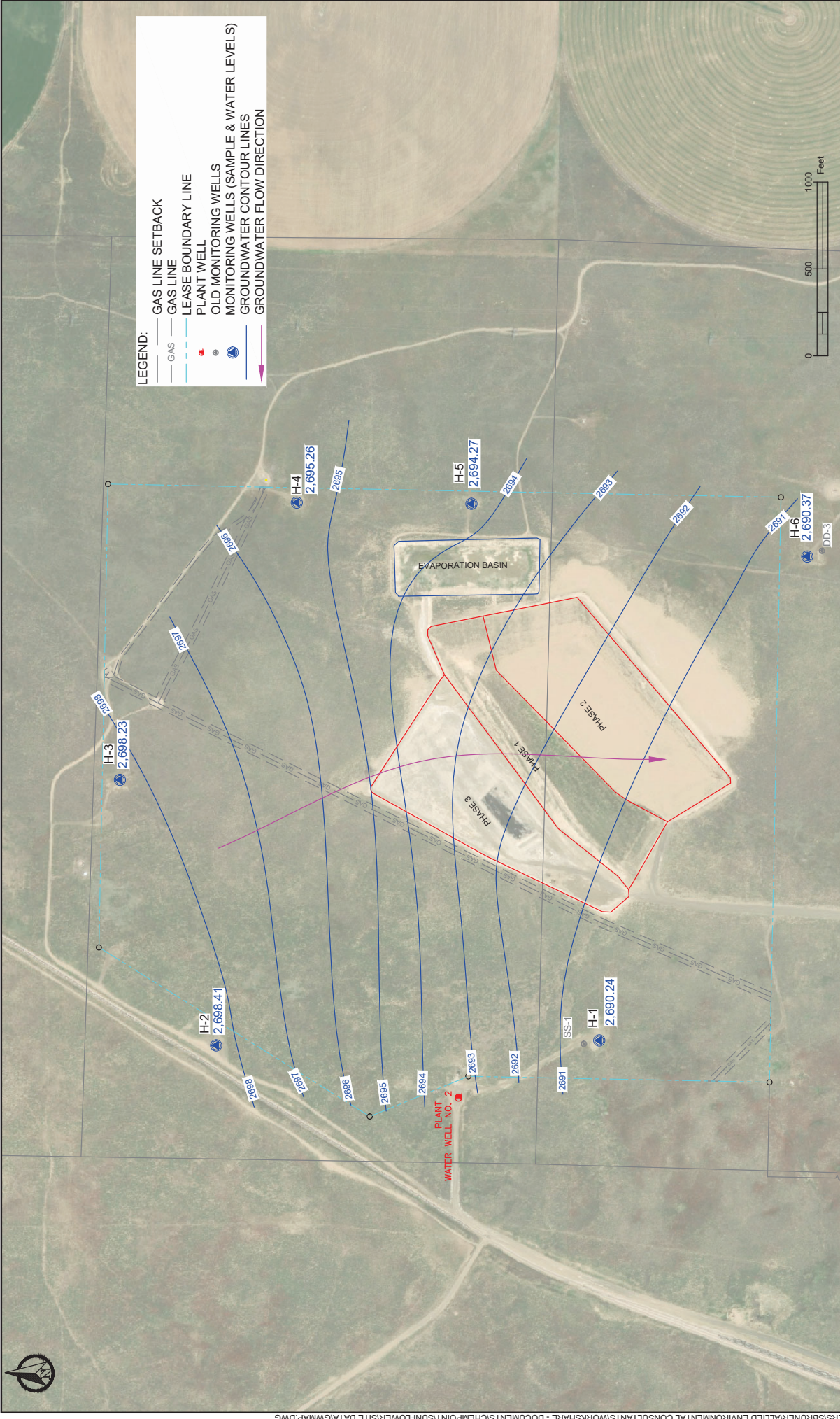


Attachments: 1 – Site Figure 2 – Table 3 – Laboratory Report 4 – Statistical Analysis  
5 - Field Data Sheets


c: Ms. Kandi George (via email: kgeorge@sunflower.net)  
Ms. Justine Sullivan (via email: jsullivan@sunflower.net)

**ATTACHMENT 1**

**FIGURE**



- LEGEND:**
- GAS LINE SETBACK
  - GAS LINE
  - LEASE BOUNDARY LINE
  - PLANT WELL
  - OLD MONITORING WELLS
  - MONITORING WELLS (SAMPLE & WATER LEVELS)
  - GROUNDWATER CONTOUR LINES
  - GROUNDWATER FLOW DIRECTION

<p><b>SUNFLOWER ELECTRIC HOLCOMB, KANSAS PLANT INDUSTRIAL LANDFILL</b></p>	<p><b>GROUNDWATER ELEVATIONS OCTOBER 2025</b></p>	<p><b>FIGURE 1</b></p>
<p>PROJECT: 25002-24908 SCALE: AS SHOWN DATE: 10/15/2025 DRAWN BY: SMB CHKD BY: TBF</p>		
 <p>727 NW 40th Ave. Ste 208 • Wichita, KS 67214 • 316.992.4698</p>		

**ATTACHMENT 2**

**ANALYTICAL SUMMARY TABLE**

**Table 1: Summary of Fall 2025 Analytical Results**  
Sunflower Electric Power Corporation  
Holcomb Common Facilities, LLC.

Location	Measure Point Elevation (TOC) *	Sample Date**	Depth to Water (BTOC)	Groundwater Elevation (ft. AMSL)	Field Parameters			Detection Monitoring Appendix III Constituents						
					Temperature (deg.F)	Conductivity (µS/cm)	Turbidity (NTU)	pH (su)	Boron, Total (µg/L)	Calcium, Total (µg/L)	Chloride (mg/L)	Fluoride (mg/L)	Sulfate (mg/L)	TDS (mg/L)
Up-Gradient	2914.71	10/15/2025	216.30	2,698.41	74.8	1298.0	6.28	7.36	68.5	150,000	44.0	0.408	401	814
	2905.93	10/15/2025	207.70	2,698.23	74.0	2369.0	9.78	7.20	59.7	325,000	93.3	0.277	1,260	1,790
	2901.66	10/15/2025	206.40	2,695.26	73.0	977.0	0.95	7.20	ND (50.0)	123,000	43.6	0.378	127	646
Down-Gradient	2924.54	10/15/2025	234.30	2,690.24	74.9	534.0	0.49	7.61	54.0	46,500	5.52	0.198	29.6	252
	2896.67	10/15/2025	202.40	2,694.27	69.2	780.0	1.29	7.51	ND (50.0)	86,500	23.9	0.386	165	476
	2940.37	10/15/2025	250.00	2,690.37	71.0	590.0	1.17	7.53	NE	54,440	9.8	0.503	20.2	764
					6.5 - 8.5				NE	NE	250	2.00	250	500

**Notes & Abbreviations Key:**

\* Measuring point elevation at top of well casing, from survey completed and sealed by Cornerstone Professional Services Inc. on February 12, 2016

\*\*The Depth to Water values were measured on October 9, 2025 and the groundwater samples were collected on October 15, 2025

TOC - Top of Casing

BTOC - below top of casing

ft. AMSL - Feet Above Mean Sea Level

deg F - Degrees Fahrenheit

µS/cm - microSieimens per centimeter

NTU - Nephelometric Turbidity Units

su - standard units

µg/L - micrograms per Liter

mg/L - milligrams per Liter

Bold values exceed SMCL value

Highlight values indicate SSI

ND - Non-Detect

NE - Not Established

**ATTACHMENT 3**

**LABORATORY REPORT**

**DATA VALIDATION FORM  
ALLIED ENVIRONMENTAL CONSULTANTS**

Project Name: Sunflower Fall 2025 Sampling

Project/Client Numbers: 25002-2:4908

Laboratory Name & Certification #: ALS Environmental E-10352

Laboratory Episode ID: HS25100853 "Episode" = set of analytical reports represented one COC submittal.

**Part I: Samples Represented In This Episode => Compare COC Form with Lab Identification**

Sample ID	Lab. ID	Sample ID	Lab. ID	Sample ID	Lab. ID	Sample ID	Lab. ID
Well #1	HS25100853-01	Well #6	HS25100853-06				
Well #2	HS25100853-02						
Well #3	HS25100853-03						
Well #4	HS25100853-04						
Well #5	HS25100853-05						

**Part II: HOLDING TIME REQUIREMENTS**

Date Samples Collected	7-Day Holding/Extract	14-Day Holding	Other Holding Date
10/15/2025	10/22/2025		28 Days-11/12/25; 180 Days-4/13/26

**Part III: COMPLETENESS**

Review Item	YES	NO	NA	Note Ref. Or Comment
Sample Manifest or Chain-of-Custody Complete	✓			
Sample receipt / inspection form by Lab – list concerns		✓		
Lab Completed All Request Analysis	✓			
Requested Detection Limits Satisfied	✓			
Extraction & Analytical Holding Times Satisfied	✓			
Sample Preservation Satisfied	✓			
Laboratory Provided Written Narrative – if yes see next page	✓			
Project Analytical Objectives Satisfied	✓			

**Part IV: PROJECT QUALITY CONTROL REQUIREMENTS**

Review Item	YES	NO	NA	Note Reference to Part VI
Trip Blanks accompanied VOC samples			✓	
VOCs Detected in Trip Blank			✓	
Duplicate Samples Collected / Listed on COC		✓		
RPDs for Duplicate vs. Original Sample Acceptable			✓	
Field Blanks Submitted and Analyzed		✓		
Decontamination Blanks Collected and Analyzed		✓		
Matrix Spike/Spike Duplicate Submitted		✓		
Surrogate Recoveries Acceptable, as reported by Lab	✓			
RPDs for MS/MSD Acceptable, as reported by Lab	✓			1.
LCS Percent Recoveries Acceptable	✓			
Analytes Detected in Lab Blank		✓		

RPD - Relative Percent Difference

**PART V: DATA QUALITY ASSESSMENT**

Data is acceptable for use as reported? Acceptable  Not Acceptable

If some or all of the data is **Not Acceptable**, please indicate which analyses require qualification in the Comments Section. Describe how any issue or question regarding data quality or validity has been resolved.

**PART VI: COMMENTS Use additional pages, if needed.**

Note Ref.	Comments (List Questions to Lab)	Describe Resolution
1.	The laboratory reported that the MS/MSD recovery was outside of laboratory control limits for Calcium & Sulfate	
	however the result in the parent sample is greater than 4x the spike amount so it is not a concern.	

**Laboratory Written Narrative**

Metals by Method E200.8

Batch ID: 234760

Sample ID: Well #1 (HS25100853-01MS)

The MS and/or MSD recovery was outside of the control; however, the result in the parent sample is greater than 4x the spike amount. Calcium.

Sample ID: Well #2 (HS25100853-02MSD)

The MS and/or MSD recovery was outside of the control; however, the result in the parent sample is greater than 4x the spike amount. Calcium.

WetChemistry by Method E300

Batch ID: R525032

Sample ID: HS25101232-01MS

- MS and MSD are for an unrelated sample (Sulfate)



right solutions.  
right partner.

---

10450 Stancliff Rd. Suite 210  
Houston, TX 77099  
T: +1 281 530 5656  
F: +1 281 530 5887

October 30, 2025

Kandi George  
Sunflower Electric Power Corporation  
2440 Holcomb Power  
Holcomb, KS 67851

Work Order: **HS25100853**

Laboratory Results for: **Well #1**

Dear Kandi George,

ALS Environmental received 6 sample(s) on Oct 16, 2025 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

QC sample results for this data met EPA or laboratory specifications except as noted in the Case Narrative or as noted with qualifiers in the QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained by ALS Environmental. Samples will be disposed in 30 days unless storage arrangements are made.

If you have any questions regarding this report, please feel free to call me.

Sincerely,

Generated By: JUMOKE.LAWAL

Jessica Monfore  
Project Manager



**Client:** Sunflower Electric Power Corporation  
**Project:** Well #1  
**Work Order:** HS25100853

**SAMPLE SUMMARY**

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
HS25100853-01	Well #1	Water		15-Oct-2025 09:40	16-Oct-2025 09:00	<input type="checkbox"/>
HS25100853-02	Well #2	Water		15-Oct-2025 09:50	16-Oct-2025 09:00	<input type="checkbox"/>
HS25100853-03	Well #3	Water		15-Oct-2025 10:05	16-Oct-2025 09:00	<input type="checkbox"/>
HS25100853-04	Well #4	Water		15-Oct-2025 10:20	16-Oct-2025 09:00	<input type="checkbox"/>
HS25100853-05	Well #5	Water		15-Oct-2025 11:10	16-Oct-2025 09:00	<input type="checkbox"/>
HS25100853-06	Well #6	Water		15-Oct-2025 10:30	16-Oct-2025 09:00	<input type="checkbox"/>

---

**Client:** Sunflower Electric Power Corporation  
**Project:** Well #1  
**Work Order:** HS25100853

**CASE NARRATIVE**

---

**Metals by Method E200.8**

**Batch ID: 234760**

**Sample ID: Well #1 (HS25100853-01MS)**

- The MS and/or MSD recovery was outside of the control; however, the result in the parent sample is greater than 4x the spike amount. Calcium.

**Sample ID: Well #2 (HS25100853-02MSD)**

- The MS and/or MSD recovery was outside of the control; however, the result in the parent sample is greater than 4x the spike amount. Calcium.

---

**WetChemistry by Method E300**

**Batch ID: R525032**

**Sample ID: HS25101232-01MS**

- MS and MSD are for an unrelated sample (Sulfate)

**Batch ID: R524893**

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

---

**WetChemistry by Method M2540C**

**Batch ID: R524241,R524243**

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.
-

Client: Sunflower Electric Power Corporation  
 Project: Well #1  
 Sample ID: Well #1  
 Collection Date: 15-Oct-2025 09:40

**ANALYTICAL REPORT**  
 WorkOrder:HS25100853  
 Lab ID:HS25100853-01  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		<b>Method:E200.8</b>		Prep:E200.8 / 27-Oct-2025		Analyst: JC
Boron	54.0		50.0	ug/L	1	29-Oct-2025 18:04
Calcium	46,500		200	ug/L	1	29-Oct-2025 18:04
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		<b>Method:E300</b>				Analyst: TH
Chloride	5.52		0.500	mg/L	1	24-Oct-2025 22:07
Fluoride	0.198		0.100	mg/L	1	24-Oct-2025 22:07
Sulfate	29.6		0.500	mg/L	1	24-Oct-2025 22:07
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		<b>Method:M2540C</b>				Analyst: HB
Total Dissolved Solids (Residue, Filterable)	252		10.0	mg/L	1	17-Oct-2025 09:00

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: Sunflower Electric Power Corporation  
 Project: Well #1  
 Sample ID: Well #2  
 Collection Date: 15-Oct-2025 09:50

**ANALYTICAL REPORT**  
 WorkOrder:HS25100853  
 Lab ID:HS25100853-02  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		Method:E200.8		Prep:E200.8 / 27-Oct-2025		Analyst: JC
Boron	68.5		50.0	ug/L	1	29-Oct-2025 18:12
Calcium	150,000		200	ug/L	1	29-Oct-2025 18:12
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		Method:E300				Analyst: TH
Chloride	44.0		0.500	mg/L	1	24-Oct-2025 22:12
Fluoride	0.408		0.100	mg/L	1	24-Oct-2025 22:12
Sulfate	401		5.00	mg/L	10	27-Oct-2025 11:06
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		Method:M2540C				Analyst: HB
Total Dissolved Solids (Residue, Filterable)	814		10.0	mg/L	1	17-Oct-2025 09:00

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: Sunflower Electric Power Corporation  
 Project: Well #1  
 Sample ID: Well #3  
 Collection Date: 15-Oct-2025 10:05

**ANALYTICAL REPORT**  
 WorkOrder:HS25100853  
 Lab ID:HS25100853-03  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		Method:E200.8			Prep:E200.8 / 27-Oct-2025	Analyst: JC
Boron	59.7		50.0	ug/L	1	29-Oct-2025 18:32
Calcium	325,000		4000	ug/L	20	29-Oct-2025 19:11
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		Method:E300				Analyst: TH
Chloride	93.3		0.500	mg/L	1	24-Oct-2025 22:18
Fluoride	0.277		0.100	mg/L	1	24-Oct-2025 22:18
Sulfate	1,260		10.0	mg/L	20	24-Oct-2025 22:24
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		Method:M2540C				Analyst: HB
Total Dissolved Solids (Residue, Filterable)	1,790		10.0	mg/L	1	17-Oct-2025 09:00

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: Sunflower Electric Power Corporation  
 Project: Well #1  
 Sample ID: Well #4  
 Collection Date: 15-Oct-2025 10:20

**ANALYTICAL REPORT**  
 WorkOrder:HS25100853  
 Lab ID:HS25100853-04  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		<b>Method:E200.8</b>		Prep:E200.8 / 27-Oct-2025		Analyst: JC
Boron	ND		50.0	ug/L	1	29-Oct-2025 18:34
<b>Calcium</b>	<b>123,000</b>		<b>200</b>	<b>ug/L</b>	<b>1</b>	<b>29-Oct-2025 18:34</b>
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		<b>Method:E300</b>				Analyst: TH
<b>Chloride</b>	<b>43.6</b>		<b>0.500</b>	<b>mg/L</b>	<b>1</b>	<b>24-Oct-2025 22:30</b>
<b>Fluoride</b>	<b>0.378</b>		<b>0.100</b>	<b>mg/L</b>	<b>1</b>	<b>24-Oct-2025 22:30</b>
<b>Sulfate</b>	<b>127</b>		<b>2.50</b>	<b>mg/L</b>	<b>5</b>	<b>27-Oct-2025 11:12</b>
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		<b>Method:M2540C</b>				Analyst: HB
<b>Total Dissolved Solids (Residue, Filterable)</b>	<b>646</b>		<b>10.0</b>	<b>mg/L</b>	<b>1</b>	<b>17-Oct-2025 09:00</b>

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: Sunflower Electric Power Corporation  
 Project: Well #1  
 Sample ID: Well #5  
 Collection Date: 15-Oct-2025 11:10

**ANALYTICAL REPORT**  
 WorkOrder:HS25100853  
 Lab ID:HS25100853-05  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		<b>Method:E200.8</b>		Prep:E200.8 / 27-Oct-2025		Analyst: JC
Boron	ND		50.0	ug/L	1	29-Oct-2025 18:36
<b>Calcium</b>	<b>86,500</b>		<b>200</b>	<b>ug/L</b>	<b>1</b>	<b>29-Oct-2025 18:36</b>
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		<b>Method:E300</b>				Analyst: TH
<b>Chloride</b>	<b>23.9</b>		<b>0.500</b>	<b>mg/L</b>	<b>1</b>	<b>24-Oct-2025 22:36</b>
<b>Fluoride</b>	<b>0.386</b>		<b>0.100</b>	<b>mg/L</b>	<b>1</b>	<b>24-Oct-2025 22:36</b>
<b>Sulfate</b>	<b>165</b>		<b>2.50</b>	<b>mg/L</b>	<b>5</b>	<b>27-Oct-2025 11:18</b>
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		<b>Method:M2540C</b>				Analyst: HB
<b>Total Dissolved Solids (Residue, Filterable)</b>	<b>476</b>		<b>10.0</b>	<b>mg/L</b>	<b>1</b>	<b>17-Oct-2025 09:00</b>

Note: See Qualifiers Page for a list of qualifiers and their explanation.

Client: Sunflower Electric Power Corporation  
 Project: Well #1  
 Sample ID: Well #6  
 Collection Date: 15-Oct-2025 10:30

**ANALYTICAL REPORT**  
 WorkOrder:HS25100853  
 Lab ID:HS25100853-06  
 Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
<b>TOTAL METALS BY E200.8, REV 5.4, 1994</b>		<b>Method:E200.8</b>		Prep:E200.8 / 27-Oct-2025		Analyst: JC
Boron	ND		50.0	ug/L	1	29-Oct-2025 18:38
<b>Calcium</b>	<b>54,400</b>		<b>200</b>	<b>ug/L</b>	<b>1</b>	<b>29-Oct-2025 18:38</b>
<b>ANIONS BY E300.0, REV 2.1, 1993</b>		<b>Method:E300</b>				Analyst: TH
<b>Chloride</b>	<b>9.84</b>		<b>0.500</b>	<b>mg/L</b>	<b>1</b>	<b>24-Oct-2025 22:42</b>
<b>Fluoride</b>	<b>0.503</b>		<b>0.100</b>	<b>mg/L</b>	<b>1</b>	<b>24-Oct-2025 22:42</b>
<b>Sulfate</b>	<b>20.2</b>		<b>0.500</b>	<b>mg/L</b>	<b>1</b>	<b>24-Oct-2025 22:42</b>
<b>TOTAL DISSOLVED SOLIDS BY SM2540C</b>		<b>Method:M2540C</b>				Analyst: HB
<b>Total Dissolved Solids (Residue, Filterable)</b>	<b>764</b>		<b>10.0</b>	<b>mg/L</b>	<b>1</b>	<b>17-Oct-2025 10:00</b>

Note: See Qualifiers Page for a list of qualifiers and their explanation.



Weight / Prep Log

**Client:** Sunflower Electric Power Corporation  
**Project:** Well #1  
**WorkOrder:** HS25100853

<b>Batch ID:</b> 234760	<b>Start Date:</b> 27 Oct 2025 08:00	<b>End Date:</b> 27 Oct 2025 08:00
<b>Method:</b> TOTAL METALS PREP BY E200.8, REV 5.4, 1994		<b>Prep Code:</b> 200.8PR

Sample ID	Container	Sample Wt/Vol	Final Volume	Prep Factor	
HS25100853-01		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25100853-02		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25100853-03		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25100853-04		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25100853-05		10 (mL)	10 (mL)	1	120 plastic HNO3
HS25100853-06		10 (mL)	10 (mL)	1	120 plastic HNO3



**Client:** Sunflower Electric Power Corporation  
**Project:** Well #1  
**WorkOrder:** HS25100853

**DATES REPORT**

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
<b>Batch ID:</b> 234760 ( 0 )		<b>Test Name :</b> TOTAL METALS BY E200.8, REV 5.4, 1994			<b>Matrix:</b> Water	
HS25100853-01	Well #1	15 Oct 2025 09:40		27 Oct 2025 08:00	29 Oct 2025 18:04	1
HS25100853-02	Well #2	15 Oct 2025 09:50		27 Oct 2025 08:00	29 Oct 2025 18:12	1
HS25100853-03	Well #3	15 Oct 2025 10:05		27 Oct 2025 08:00	29 Oct 2025 19:11	20
HS25100853-03	Well #3	15 Oct 2025 10:05		27 Oct 2025 08:00	29 Oct 2025 18:32	1
HS25100853-04	Well #4	15 Oct 2025 10:20		27 Oct 2025 08:00	29 Oct 2025 18:34	1
HS25100853-05	Well #5	15 Oct 2025 11:10		27 Oct 2025 08:00	29 Oct 2025 18:36	1
HS25100853-06	Well #6	15 Oct 2025 10:30		27 Oct 2025 08:00	29 Oct 2025 18:38	1
<b>Batch ID:</b> R524241 ( 0 )		<b>Test Name :</b> TOTAL DISSOLVED SOLIDS BY SM2540C			<b>Matrix:</b> Water	
HS25100853-01	Well #1	15 Oct 2025 09:40			17 Oct 2025 09:00	1
HS25100853-02	Well #2	15 Oct 2025 09:50			17 Oct 2025 09:00	1
HS25100853-03	Well #3	15 Oct 2025 10:05			17 Oct 2025 09:00	1
HS25100853-04	Well #4	15 Oct 2025 10:20			17 Oct 2025 09:00	1
HS25100853-05	Well #5	15 Oct 2025 11:10			17 Oct 2025 09:00	1
<b>Batch ID:</b> R524243 ( 0 )		<b>Test Name :</b> TOTAL DISSOLVED SOLIDS BY SM2540C			<b>Matrix:</b> Water	
HS25100853-06	Well #6	15 Oct 2025 10:30			17 Oct 2025 10:00	1
<b>Batch ID:</b> R524893 ( 0 )		<b>Test Name :</b> ANIONS BY E300.0, REV 2.1, 1993			<b>Matrix:</b> Water	
HS25100853-01	Well #1	15 Oct 2025 09:40			24 Oct 2025 22:07	1
HS25100853-02	Well #2	15 Oct 2025 09:50			24 Oct 2025 22:12	1
HS25100853-03	Well #3	15 Oct 2025 10:05			24 Oct 2025 22:24	20
HS25100853-03	Well #3	15 Oct 2025 10:05			24 Oct 2025 22:18	1
HS25100853-04	Well #4	15 Oct 2025 10:20			24 Oct 2025 22:30	1
HS25100853-05	Well #5	15 Oct 2025 11:10			24 Oct 2025 22:36	1
HS25100853-06	Well #6	15 Oct 2025 10:30			24 Oct 2025 22:42	1
<b>Batch ID:</b> R525032 ( 0 )		<b>Test Name :</b> ANIONS BY E300.0, REV 2.1, 1993			<b>Matrix:</b> Water	
HS25100853-02	Well #2	15 Oct 2025 09:50			27 Oct 2025 11:06	10
HS25100853-04	Well #4	15 Oct 2025 10:20			27 Oct 2025 11:12	5
HS25100853-05	Well #5	15 Oct 2025 11:10			27 Oct 2025 11:18	5

**Client:** Sunflower Electric Power Corporation  
**Project:** Well #1  
**WorkOrder:** HS25100853

**QC BATCH REPORT**

Batch ID: 234760 ( 0 )		Instrument: ICPMS06		Method: TOTAL METALS BY E200.8, REV 5.4, 1994						
<b>MBLK</b>	Sample ID: <b>MBLK-234760</b>	Units: <b>ug/L</b>			Analysis Date: <b>29-Oct-2025 18:00</b>					
Client ID:		Run ID: <b>ICPMS06_525187</b>	SeqNo: <b>9111136</b>	PrepDate: <b>27-Oct-2025</b>	DF: <b>1</b>					
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit Qual	
Boron	ND	50.0								
Calcium	ND	200								
<b>LCS</b>	Sample ID: <b>LCS-234760</b>	Units: <b>ug/L</b>			Analysis Date: <b>29-Oct-2025 18:24</b>					
Client ID:		Run ID: <b>ICPMS06_525187</b>	SeqNo: <b>9111148</b>	PrepDate: <b>27-Oct-2025</b>	DF: <b>1</b>					
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit Qual	
Boron	442.5	50.0	500	0	88.5	85 - 115				
Calcium	5102	200	5000	0	102	85 - 115				
<b>MS</b>	Sample ID: <b>HS25100853-02MS</b>	Units: <b>ug/L</b>			Analysis Date: <b>29-Oct-2025 18:14</b>					
Client ID: <b>Well #2</b>		Run ID: <b>ICPMS06_525187</b>	SeqNo: <b>9111143</b>	PrepDate: <b>27-Oct-2025</b>	DF: <b>1</b>					
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit Qual	
Boron	569.2	50.0	500	68.49	100	70 - 130				
Calcium	155600	200	5000	149900	114	70 - 130			O	
<b>MS</b>	Sample ID: <b>HS25100853-01MS</b>	Units: <b>ug/L</b>			Analysis Date: <b>29-Oct-2025 18:05</b>					
Client ID: <b>Well #1</b>		Run ID: <b>ICPMS06_525187</b>	SeqNo: <b>9111139</b>	PrepDate: <b>27-Oct-2025</b>	DF: <b>1</b>					
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit Qual	
Boron	549	50.0	500	54	99.0	70 - 130				
Calcium	54370	200	5000	46540	157	70 - 130			SO	
<b>MSD</b>	Sample ID: <b>HS25100853-02MSD</b>	Units: <b>ug/L</b>			Analysis Date: <b>29-Oct-2025 18:16</b>					
Client ID: <b>Well #2</b>		Run ID: <b>ICPMS06_525187</b>	SeqNo: <b>9111144</b>	PrepDate: <b>27-Oct-2025</b>	DF: <b>1</b>					
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit Qual	
Boron	579.3	50.0	500	68.49	102	70 - 130	569.2	1.76	20	
Calcium	157500	200	5000	149900	152	70 - 130	155600	1.22	20 SO	

**Client:** Sunflower Electric Power Corporation  
**Project:** Well #1  
**WorkOrder:** HS25100853

**QC BATCH REPORT**

<b>Batch ID:</b> 234760 ( 0 )		<b>Instrument:</b> ICPMS06		<b>Method:</b> TOTAL METALS BY E200.8, REV 5.4, 1994					
<b>MSD</b>	Sample ID: <b>HS25100853-01MSD</b>	Units: <b>ug/L</b>			Analysis Date: <b>29-Oct-2025 18:07</b>				
Client ID: <b>Well #1</b>	Run ID: <b>ICPMS06_525187</b>	SeqNo: <b>9111140</b>		PrepDate: <b>27-Oct-2025</b>		DF: <b>1</b>			
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit Qual

Boron	563.8	50.0	500	54	102	70 - 130	549	2.67	20
Calcium	53600	200	5000	46540	141	70 - 130	54370	1.44	20 <b>SO</b>

The following samples were analyzed in this batch:

HS25100853-01	HS25100853-02	HS25100853-03	HS25100853-04
HS25100853-05	HS25100853-06		



**Client:** Sunflower Electric Power Corporation  
**Project:** Well #1  
**WorkOrder:** HS25100853

**QC BATCH REPORT**

**Batch ID:** R524241 ( 0 )      **Instrument:** Balance1      **Method:** TOTAL DISSOLVED SOLIDS BY SM2540C

**MBLK**      Sample ID: **WMBLK-10172025**      Units: **mg/L**      Analysis Date: **17-Oct-2025 09:00**  
 Client ID:      Run ID: **Balance1\_524241**      SeqNo: **9088495**      PrepDate:      DF: **1**  
 Analyte      Result      PQL      SPK Val      SPK Ref Value      %REC      Control Limit      RPD Ref Value      %RPD      RPD Limit Qual

Total Dissolved Solids (Residue, Filterable)      ND      10.0

**LCS**      Sample ID: **WLCS-10172025**      Units: **mg/L**      Analysis Date: **17-Oct-2025 09:00**  
 Client ID:      Run ID: **Balance1\_524241**      SeqNo: **9088494**      PrepDate:      DF: **1**  
 Analyte      Result      PQL      SPK Val      SPK Ref Value      %REC      Control Limit      RPD Ref Value      %RPD      RPD Limit Qual

Total Dissolved Solids (Residue, Filterable)      990      10.0      1000      0      99.0      85 - 115

**DUP**      Sample ID: **HS25100786-02DUP**      Units: **mg/L**      Analysis Date: **17-Oct-2025 09:00**  
 Client ID:      Run ID: **Balance1\_524241**      SeqNo: **9088475**      PrepDate:      DF: **1**  
 Analyte      Result      PQL      SPK Val      SPK Ref Value      %REC      Control Limit      RPD Ref Value      %RPD      RPD Limit Qual

Total Dissolved Solids (Residue, Filterable)      43500      10.0                     44180      1.55      20

**DUP**      Sample ID: **HS25100786-01DUP**      Units: **mg/L**      Analysis Date: **17-Oct-2025 09:00**  
 Client ID:      Run ID: **Balance1\_524241**      SeqNo: **9088473**      PrepDate:      DF: **1**  
 Analyte      Result      PQL      SPK Val      SPK Ref Value      %REC      Control Limit      RPD Ref Value      %RPD      RPD Limit Qual

Total Dissolved Solids (Residue, Filterable)      51480      10.0                     51560      0.155      20

The following samples were analyzed in this batch: 

HS25100853-01	HS25100853-02	HS25100853-03	HS25100853-04
HS25100853-05			



Client: Sunflower Electric Power Corporation  
Project: Well #1  
WorkOrder: HS25100853

QC BATCH REPORT

Batch ID: R524243 ( 0 ) Instrument: Balance1 Method: TOTAL DISSOLVED SOLIDS BY SM2540C

<b>MBLK</b>	Sample ID: <b>WMBLK-10172025</b>	Units: <b>mg/L</b>			Analysis Date: <b>17-Oct-2025 10:00</b>				
Client ID:	Run ID: <b>Balance1_524243</b>	SeqNo: <b>9088501</b>		PrepDate:			DF: <b>1</b>		
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit Qual

Total Dissolved Solids (Residue, Filterable) ND 10.0

<b>LCS</b>	Sample ID: <b>WLCS-10172025</b>	Units: <b>mg/L</b>			Analysis Date: <b>17-Oct-2025 10:00</b>				
Client ID:	Run ID: <b>Balance1_524243</b>	SeqNo: <b>9088500</b>		PrepDate:			DF: <b>1</b>		
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit Qual

Total Dissolved Solids (Residue, Filterable) 1016 10.0 1000 0 102 85 - 115

<b>DUP</b>	Sample ID: <b>HS25100823-01DUP</b>	Units: <b>mg/L</b>			Analysis Date: <b>17-Oct-2025 10:00</b>				
Client ID:	Run ID: <b>Balance1_524243</b>	SeqNo: <b>9088497</b>		PrepDate:			DF: <b>1</b>		
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit Qual

Total Dissolved Solids (Residue, Filterable) 1200 10.0 1184 1.34 20

The following samples were analyzed in this batch: HS25100853-06



Client: Sunflower Electric Power Corporation  
Project: Well #1  
WorkOrder: HS25100853

QC BATCH REPORT

Batch ID: R524893 ( 0 )      Instrument: ICS-04      Method: ANIONS BY E300.0, REV 2.1, 1993

MBLK		Sample ID: MBLK			Units: mg/L		Analysis Date: 24-Oct-2025 17:42			
Client ID:		Run ID: ICS-04_524893			SeqNo: 9103449		PrepDate:		DF: 1	
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	ND	0.500								
Fluoride	ND	0.100								
Sulfate	ND	0.500								

LCS		Sample ID: LCS			Units: mg/L		Analysis Date: 24-Oct-2025 17:54			
Client ID:		Run ID: ICS-04_524893			SeqNo: 9103450		PrepDate:		DF: 1	
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	20.29	0.500	20	0	101	90 - 110				
Fluoride	4.175	0.100	4	0	104	90 - 110				
Sulfate	19.95	0.500	20	0	99.8	90 - 110				

MS		Sample ID: HS25101059-01MS			Units: mg/L		Analysis Date: 24-Oct-2025 20:56			
Client ID:		Run ID: ICS-04_524893			SeqNo: 9103477		PrepDate:		DF: 5	
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	163.5	2.50	50	110.3	106	80 - 120				
Fluoride	15.54	0.500	10	5.254	103	80 - 120				
Sulfate	47.81	2.50	50	3.45	88.7	80 - 120				

MS		Sample ID: HS25101037-01MS			Units: mg/L		Analysis Date: 24-Oct-2025 18:12			
Client ID:		Run ID: ICS-04_524893			SeqNo: 9103453		PrepDate:		DF: 800	
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	33650	400	8000	26400	90.6	80 - 120				
Fluoride	1636	80.0	1600	0	102	80 - 120				
Sulfate	9052	400	8000	1309	96.8	80 - 120				



Client: Sunflower Electric Power Corporation  
Project: Well #1  
WorkOrder: HS25100853

QC BATCH REPORT

Batch ID: R524893 ( 0 )      Instrument: ICS-04      Method: ANIONS BY E300.0, REV 2.1, 1993

MSD		Sample ID: HS25101059-01MSD			Units: mg/L		Analysis Date: 24-Oct-2025 21:02			
Client ID:		Run ID: ICS-04_524893			SeqNo: 9103478		PrepDate:		DF: 5	
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	163	2.50	50	110.3	105	80 - 120	163.5	0.288	20	
Fluoride	14.47	0.500	10	5.254	92.2	80 - 120	15.54	7.1	20	
Sulfate	47.59	2.50	50	3.45	88.3	80 - 120	47.81	0.463	20	

MSD		Sample ID: HS25101037-01MSD			Units: mg/L		Analysis Date: 24-Oct-2025 18:17			
Client ID:		Run ID: ICS-04_524893			SeqNo: 9103454		PrepDate:		DF: 800	
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Chloride	33460	400	8000	26400	88.2	80 - 120	33650	0.553	20	
Fluoride	1589	80.0	1600	0	99.3	80 - 120	1636	2.93	20	
Sulfate	9012	400	8000	1309	96.3	80 - 120	9052	0.441	20	

The following samples were analyzed in this batch: HS25100853-01 HS25100853-02 HS25100853-03 HS25100853-04  
HS25100853-05 HS25100853-06

**Client:** Sunflower Electric Power Corporation  
**Project:** Well #1  
**WorkOrder:** HS25100853

**QC BATCH REPORT**

Batch ID: R525032 ( 0 )		Instrument: ICS-04		Method: ANIONS BY E300.0, REV 2.1, 1993						
<b>MBLK</b>	Sample ID: <b>MBLK</b>	Units: <b>mg/L</b>			Analysis Date: <b>27-Oct-2025 21:17</b>					
Client ID:		Run ID: <b>ICS-04_525032</b>		SeqNo: <b>9106792</b>	PrepDate:		DF: <b>1</b>			
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit Qual	
Sulfate	ND	0.500								
<b>LCS</b>	Sample ID: <b>LCS</b>	Units: <b>mg/L</b>			Analysis Date: <b>27-Oct-2025 21:29</b>					
Client ID:		Run ID: <b>ICS-04_525032</b>		SeqNo: <b>9106793</b>	PrepDate:		DF: <b>1</b>			
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit Qual	
Sulfate	20.42	0.500	20	0	102	90 - 110				
<b>MS</b>	Sample ID: <b>HS25101232-01MS</b>	Units: <b>mg/L</b>			Analysis Date: <b>27-Oct-2025 21:46</b>					
Client ID:		Run ID: <b>ICS-04_525032</b>		SeqNo: <b>9106796</b>	PrepDate:		DF: <b>50</b>			
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit Qual	
Sulfate	2371	25.0	500	2020	70.2	80 - 120			<b>SO</b>	
<b>MS</b>	Sample ID: <b>HS25100921-01MS</b>	Units: <b>mg/L</b>			Analysis Date: <b>27-Oct-2025 22:10</b>					
Client ID:		Run ID: <b>ICS-04_525032</b>		SeqNo: <b>9106800</b>	PrepDate:		DF: <b>500</b>			
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit Qual	
Sulfate	4818	250	5000	72.55	94.9	80 - 120				
<b>MSD</b>	Sample ID: <b>HS25101232-01MSD</b>	Units: <b>mg/L</b>			Analysis Date: <b>27-Oct-2025 21:52</b>					
Client ID:		Run ID: <b>ICS-04_525032</b>		SeqNo: <b>9106797</b>	PrepDate:		DF: <b>50</b>			
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit Qual	
Sulfate	2375	25.0	500	2020	70.9	80 - 120	2371	0.156	20 <b>SO</b>	
<b>MSD</b>	Sample ID: <b>HS25100921-01MSD</b>	Units: <b>mg/L</b>			Analysis Date: <b>27-Oct-2025 22:16</b>					
Client ID:		Run ID: <b>ICS-04_525032</b>		SeqNo: <b>9106801</b>	PrepDate:		DF: <b>500</b>			
Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	RPD %RPD	RPD Limit Qual	
Sulfate	4812	250	5000	72.55	94.8	80 - 120	4818	0.132	20	

The following samples were analyzed in this batch: HS25100853-02 HS25100853-04 HS25100853-05



**Client:** Sunflower Electric Power Corporation  
**Project:** Well #1  
**WorkOrder:** HS25100853

**QUALIFIERS,  
ACRONYMS, UNITS**

<b>Qualifier</b>	<b>Description</b>
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
M	Manually integrated, see raw data for justification
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL/SDL

<b>Acronym</b>	<b>Description</b>
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitation Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

**CERTIFICATIONS,ACCREDITATIONS & LICENSES**

Agency	Number	Expire Date
Arizona	AZ0793	27-May-2026
Arkansas	88-00356_2024	17-Mar-2026
California	2919 - 2025	30-Apr-2026
Dept of Defense	L24-239	30-Apr-2026
Dept of Defense	L24-240	30-Apr-2026
Florida	E87611-2025	30-Jun-2026
Illinois	200032 - 2025	31-Jul-2026
Kansas	KS-C25-00168	31-Jul-2026
Kentucky	123043-2025	30-Apr-2026
Louisiana	03087-2025	30-Jun-2026
Maine	2024017	23-Jun-2026
Michigan	9971-2025	30-Apr-2026
Minnesota	2856348	31-Dec-2025
Missouri	136	30-Sep-2026
Nebraska	NE-OS-25-13 - 2025	30-Apr-2026
Nevada	NV-C25-00124 - 2025	31-Jul-2026
New Hampshire	209425	24-Apr-2026
New Jersey	TX008-2025	30-Jun-2026
New York	11707 - 2025	01-Apr-2026
North Carolina	624 - 2024	31-Dec-2025
Oregon	TX200002-013	15-May-2026
Pennsylvania	019	01-Jul-2026
Tennessee	TN	30-Apr-2026
Texas	TX-C25-00104	30-Apr-2026



Sample Receipt Checklist

Work Order ID: HS25100853  
Client Name: Sunflower EPC

Date/Time Received: 16-Oct-2025 09:00  
Received by: Kaycee Rogers

Completed By: /S/ Chelsea Rogers 16-Oct-2025 22:02  
Reviewed by: /S/ Beverly Mustafa 17-Oct-2025 09:02

eSignature

Date/Time

eSignature

Date/Time

Matrices: **W**

Carrier name: **FedEx**

- Shipping container/cooler in good condition? Yes  No  Not Present
- Custody seals intact on shipping container/cooler? Yes  No  Not Present
- Custody seals intact on sample bottles? Yes  No  Not Present
- VOA/TX1005/TX1006 Solids in hermetically sealed vials? Yes  No  Not Present
- Chain of custody present? Yes  No  1 Page(s)
- Chain of custody signed when relinquished and received? Yes  No  COC IDs:349109
- Samplers name present on COC? Yes  No
- Chain of custody agrees with sample labels? Yes  No
- Samples in proper container/bottle? Yes  No
- Sample containers intact? Yes  No
- Sufficient sample volume for indicated test? Yes  No
- All samples received within holding time? Yes  No
- Container/Temp Blank temperature in compliance? Yes  No

Temperature(s)/Thermometer(s): 2.0UC/2.0C IR 34  
Cooler(s)/Kit(s): BLUE  
Date/Time sample(s) sent to storage: 10/16/2025 22:02

- Water - VOA vials have zero headspace? Yes  No  No VOA vials submitted
- Water - pH acceptable upon receipt? Yes  No  N/A
- pH adjusted? Yes  No  N/A

pH adjusted by:

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:



Cincinnati, OH  
+1 513 733 5336  
Everett, WA  
+1 425 356 2600

Fort Collins, CO  
+1 970 490 1511  
Holland, MI  
+1 616 399 6070

Houston, TX  
+1 281 530 5656  
Middletown, PA  
+1 717 944 5541

Spring City, PA  
+1 610 948 4903  
Salt Lake City, UT  
+1 801 266 7700

South Charleston, WV  
+1 304 356 3168  
York, PA  
+1 717 505 5280

Chain of Custody Form  
Page 1 of 1  
COC ID: 349109

Customer Information				Project Information				ALS Work Order #:										
Purchase Order	PUR25026046	Project Name		A	200.8 (Total B, Ca)	Parameter/Method Request for Analysis												
Work Order		Project Number		B	300_W(Cl, E, SO4)													
Company Name	Sunflower Electric Power Corporat	Bill To Company	Sunflower Electric Power Corporat	C	TDS_W_2540C (TDS)													
Send Report To	Kandi George	Invoice Attn	Kandi George	D														
Address	2440 Holcomb Power	Address	2440 Holcomb Power	E														
City/State/Zip	Holcomb, KS 67851	City/State/Zip	Holcomb KS 67851	F														
Phone		Phone		G														
Fax		Fax		H														
e-Mail Address	kgeorge@sunflower.net	e-Mail Address	kgeorge@sunflower.net	I														
				J														
No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold	
1	Well # 1	10/15/2025	9:40 am	AQ	1	2	X	X	X									
2	Well # 2	10/15/2025	9:50 am	AQ	1	2	X	X	X									
3	Well # 3	10/15/2025	10:05 am	AQ	1	2	X	X	X									
4	Well # 4	10/15/2025	10:20 am	AQ	1	2	X	X	X									
5	Well # 5	10/15/2025	11:10 am	AQ	1	2	X	X	X									
6	Well # 6	10/15/2025	10:30 am	VAQ	1	2	X	X	X									
7																		
8																		
9																		
10																		

**HS25100853**  
Sunflower Electric Power Corporation  
Well #1

Required Turnaround Time: (Check Box)  5 Wk. Days  2 Wk. Days  24 Hour

Shipment Method: **FEDEX**

Received by (Laboratory): **Kandi George** Date: **10/15/2025** Time: **4:00 PM**

Received by (Laboratory): **Kandi George** Date: **10/16/25** Time: **9:00**

Preservative Key: 1-HCl 2-HNO<sub>3</sub> 3-H<sub>2</sub>SO<sub>4</sub> 4-NaOH 5-Na<sub>2</sub>S<sub>2</sub>O<sub>3</sub> 6-AsH<sub>3</sub> 7-Other 8-4°C 9-5035

QC Package: (Check One Box Below)  
 Level II Std OC  
 Level III Std QC/Raw Date  
 Level IV SV/845/CLP  
 Other


Notes: Sunflower General Pricing  
Cooler ID: **11234** Cooler Temp: **5.0**  
 Blue  2.0

Results Due Date: \_\_\_\_\_

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to ALS Environmental.  
 2. Unless otherwise agreed in a formal contract, services provided by ALS Environmental are expressly limited to the terms and conditions stated on the reverse.  
 3. The Chain of Custody is a legal document. All information must be completed accurately.

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**ALS**  
 10450 Standliff Rd., Suite  
 Houston, Texas 77096  
 Tel. +1 281 530 5656  
 Fax. +1 281 530 5887




**CUSTODY SEAL**

Seal Broken By: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Name: Kandi George  
 Company: Smart Power Electric Supply Corp  
 Date: 10/15/2025 Time: 12:15 pm

210

**FedEx**  
 TRAK# 0201 8852 0364 1550  
**XG SGRA**  
 THU - 16 OCT A  
 STANDARD OVERNIGHT  
 77099  
 TX-US IAN  
 EXP 10/28

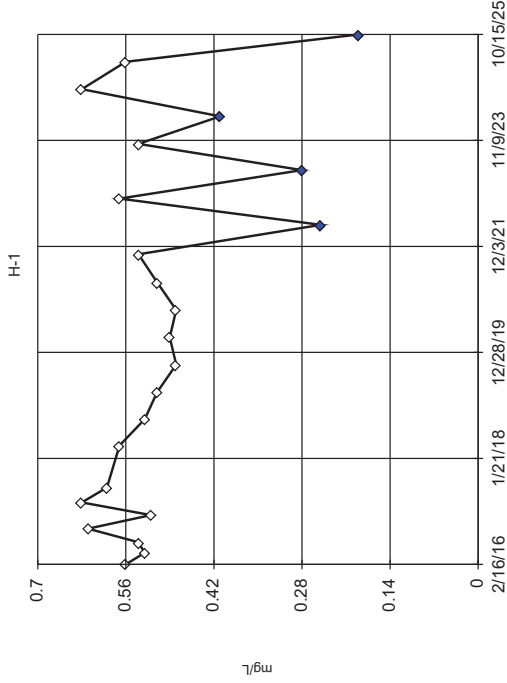


885203641550

**ATTACHMENT 4**

**STATISTICAL ANALYSIS**

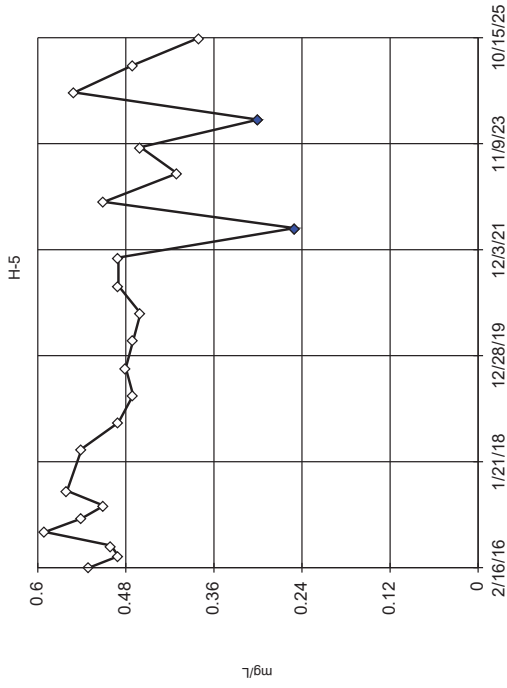
### EPA 1989 Outlier Screening



Constituent: Fluoride Analysis Run 12/17/2025 7:59 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

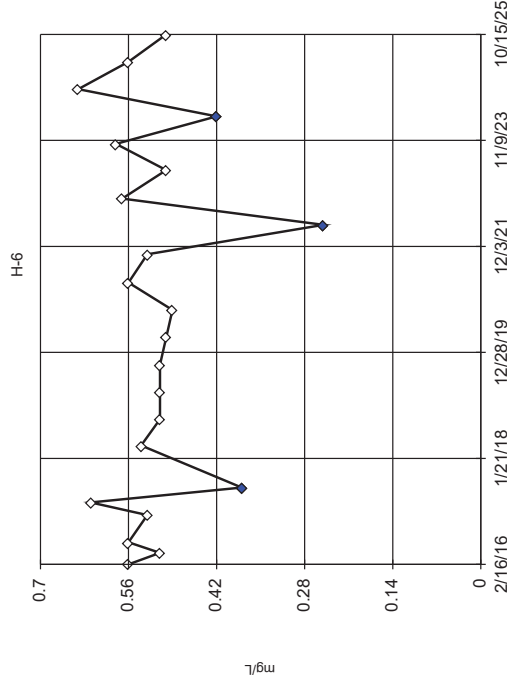
### EPA 1989 Outlier Screening



Constituent: Fluoride Analysis Run 12/17/2025 8:00 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

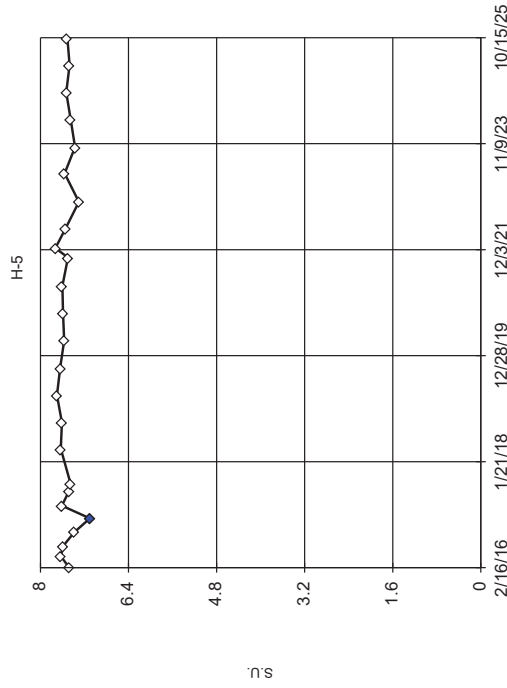
### EPA 1989 Outlier Screening



Constituent: Fluoride Analysis Run 12/17/2025 8:00 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### EPA 1989 Outlier Screening

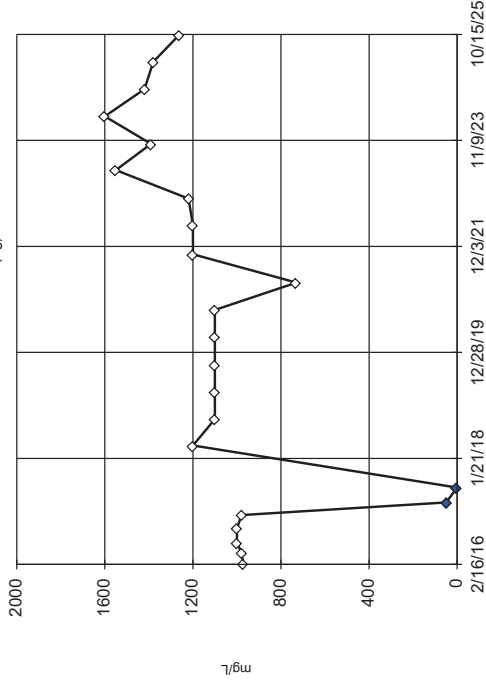


Constituent: pH Analysis Run 12/17/2025 8:00 AM

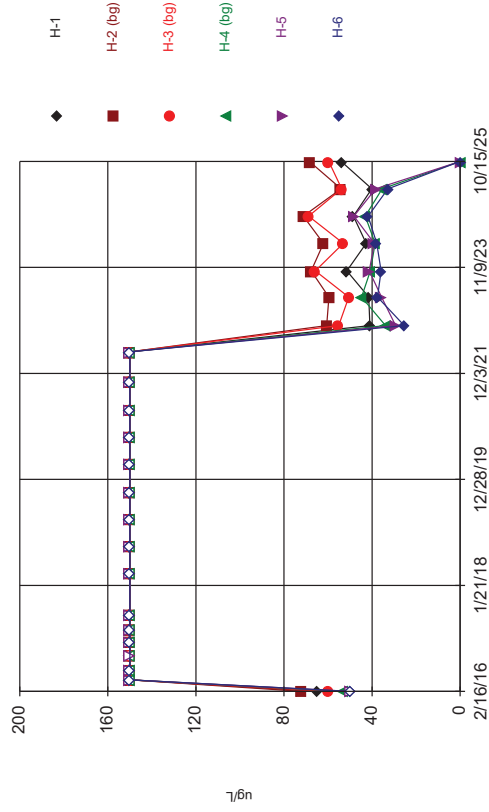
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

EPA 1989 Outlier Screening

H-3 (bg)



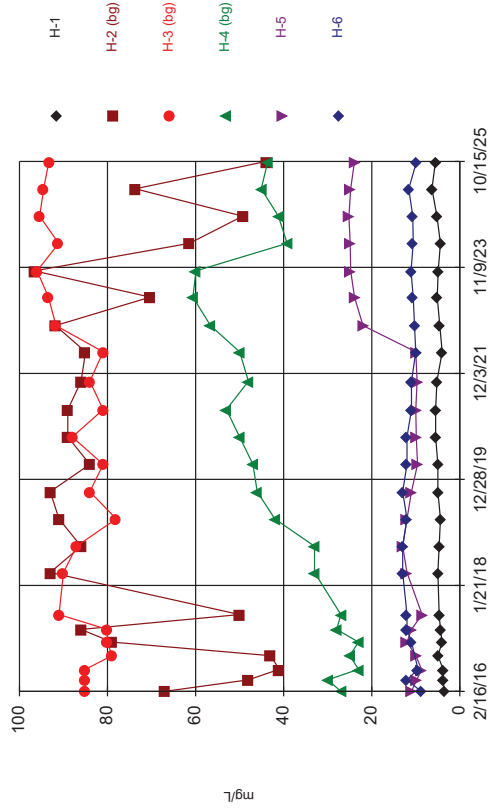
### Time Series



Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:07 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

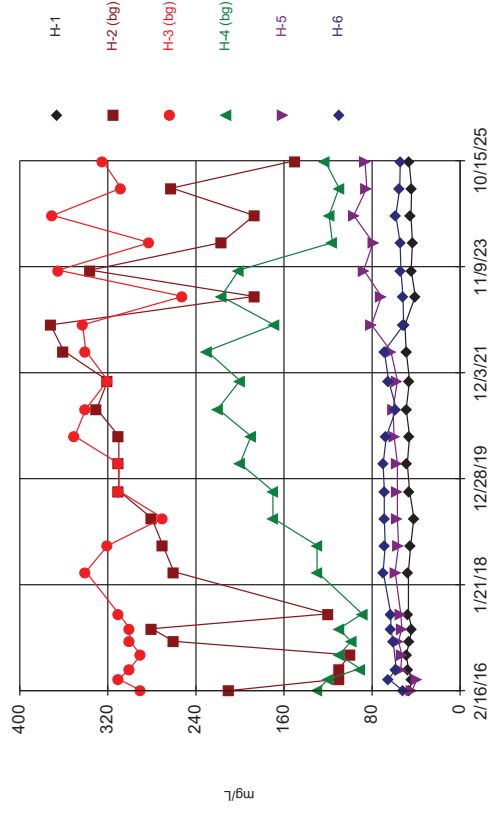
### Time Series



Constituent: Chloride Analysis Run 12/17/2025 8:07 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

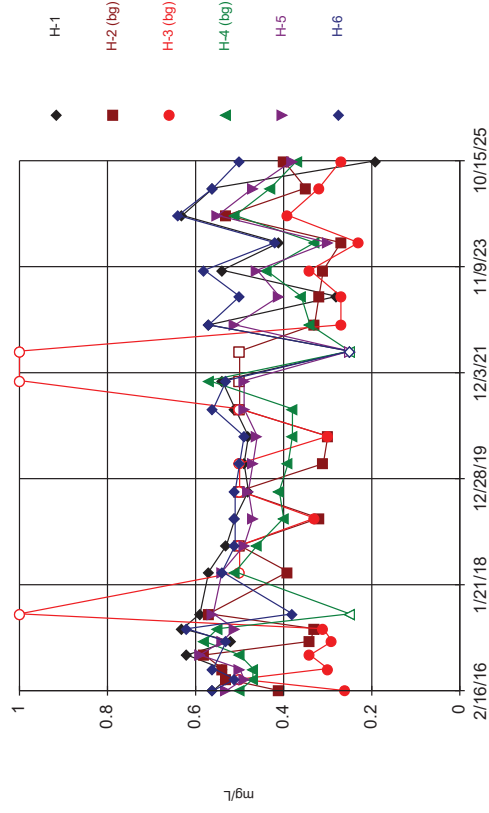
### Time Series



Constituent: Calcium Analysis Run 12/17/2025 8:07 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

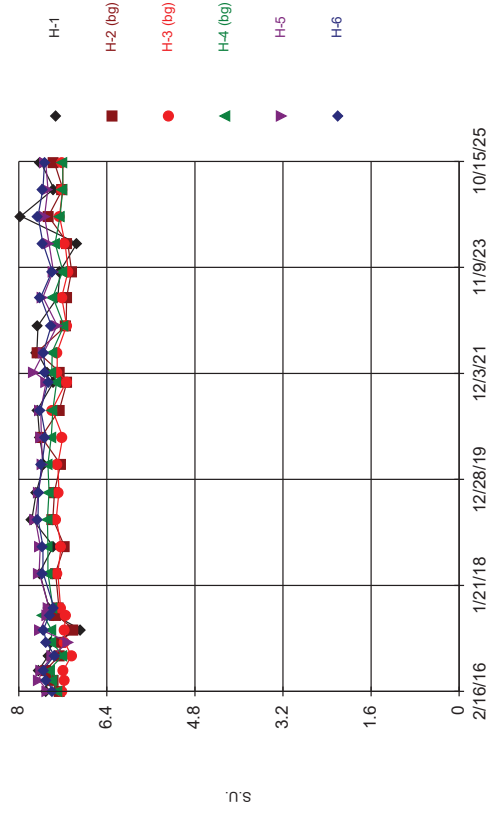
### Time Series



Constituent: Fluoride Analysis Run 12/17/2025 8:07 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

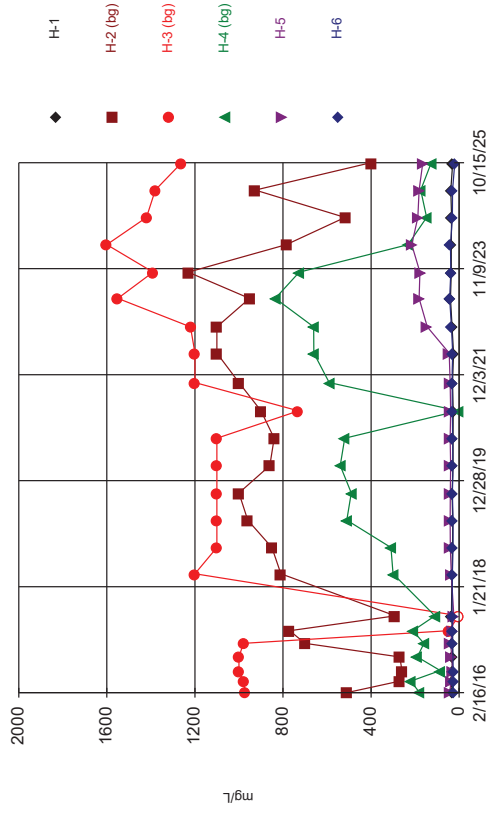
Time Series



Constituent: pH Analysis Run 12/17/2025 8:07 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

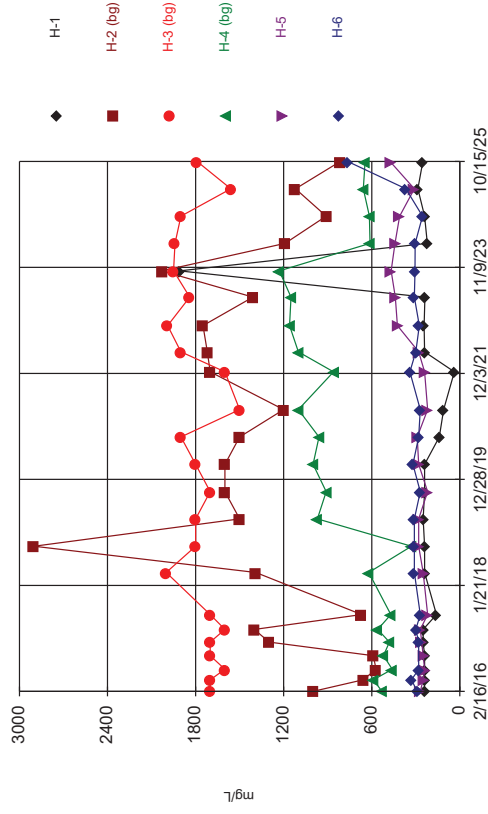
Time Series



Constituent: Sulfate Analysis Run 12/17/2025 8:07 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

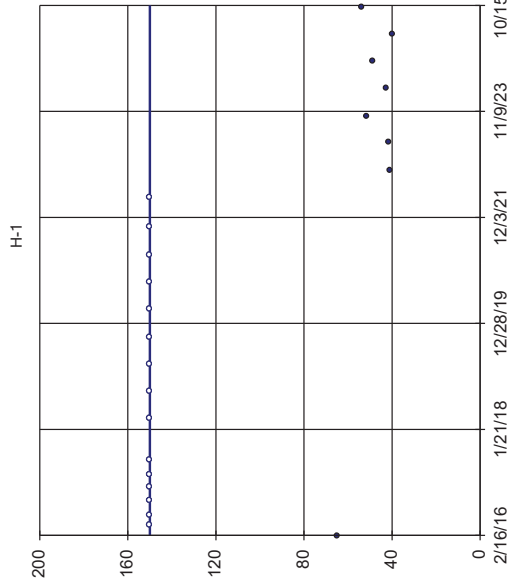
Time Series



Constituent: Total Dissolved Solids Analysis Run 12/17/2025 8:07 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

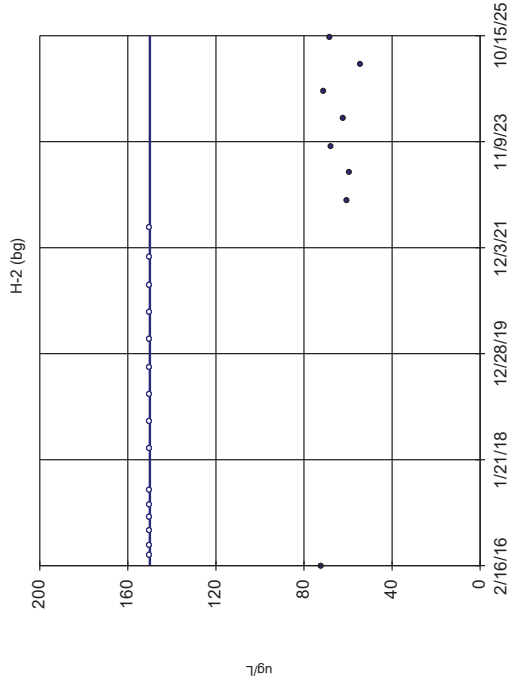
### Sen's Slope Estimator



n = 23  
Slope = 0  
units per year.  
Mann-Kendall  
statistic = -90  
critical = -89  
Decreasing trend  
significant at 98%  
confidence level  
( $\alpha = 0.01$  per  
tail).

Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:06 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

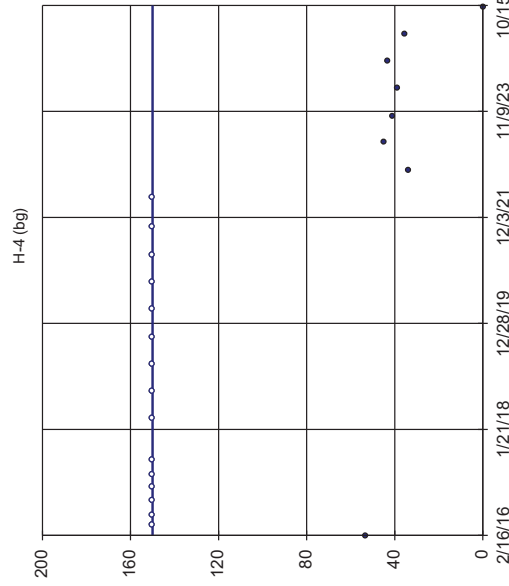
### Sen's Slope Estimator



n = 23  
Slope = 0  
units per year.  
Mann-Kendall  
statistic = -92  
critical = -89  
Decreasing trend  
significant at 98%  
confidence level  
( $\alpha = 0.01$  per  
tail).

Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:06 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

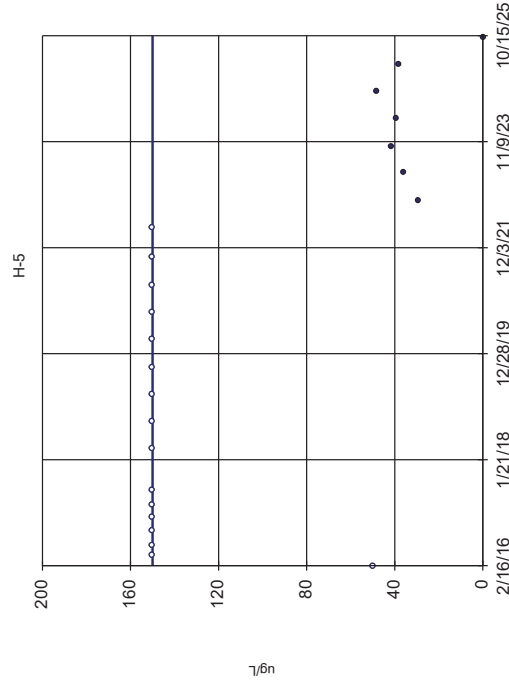
### Sen's Slope Estimator



n = 23  
Slope = 0  
units per year.  
Mann-Kendall  
statistic = -94  
critical = -89  
Decreasing trend  
significant at 98%  
confidence level  
( $\alpha = 0.01$  per  
tail).

Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:06 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

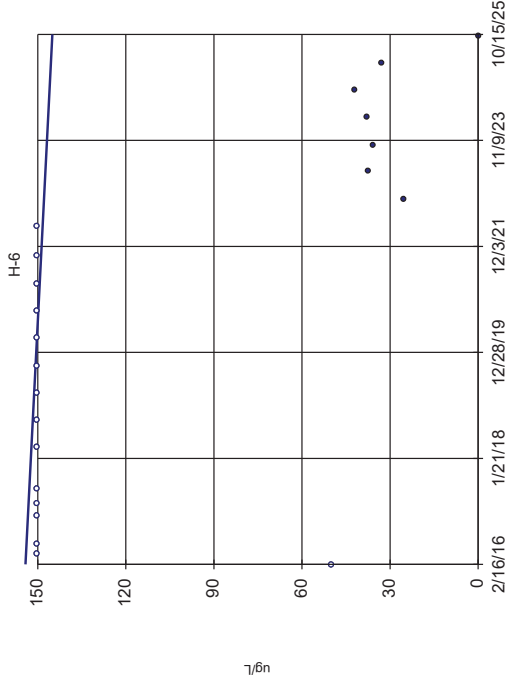
### Sen's Slope Estimator



n = 23  
Slope = 0  
units per year.  
Mann-Kendall  
statistic = -90  
critical = -89  
Decreasing trend  
significant at 98%  
confidence level  
( $\alpha = 0.01$  per  
tail).

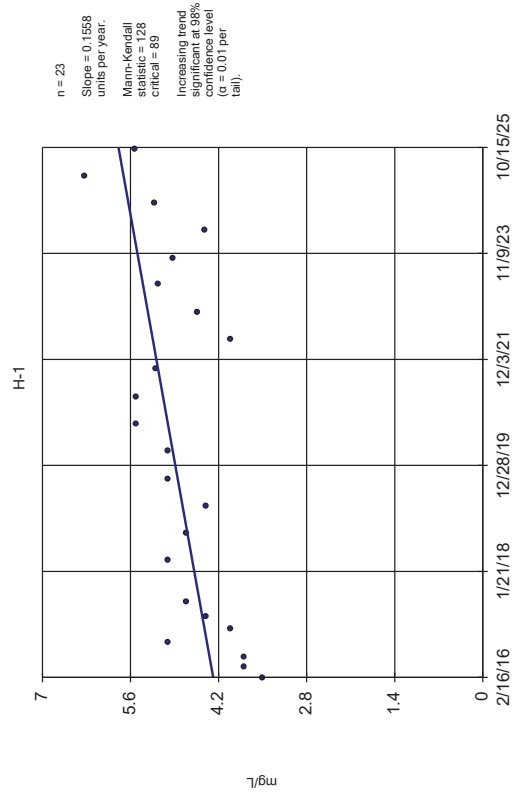
Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:06 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### Sen's Slope Estimator



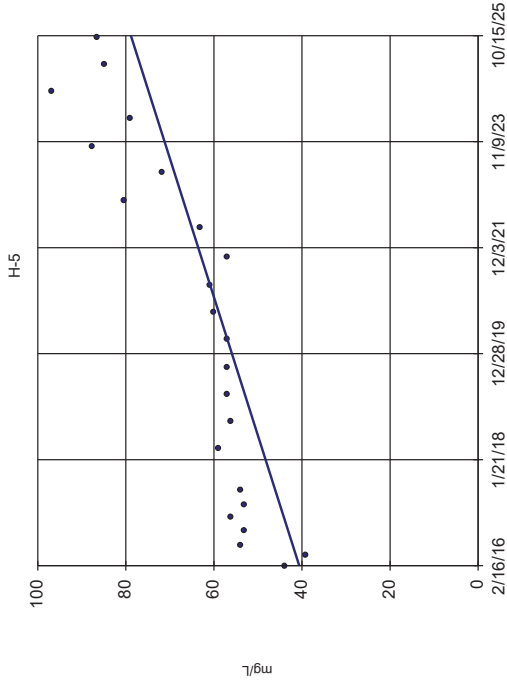
Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:06 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### Sen's Slope Estimator



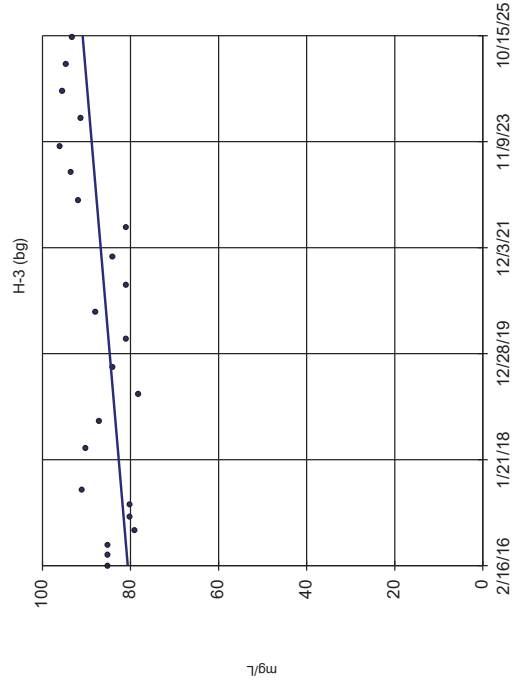
Constituent: Chloride Analysis Run 12/17/2025 8:06 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### Sen's Slope Estimator



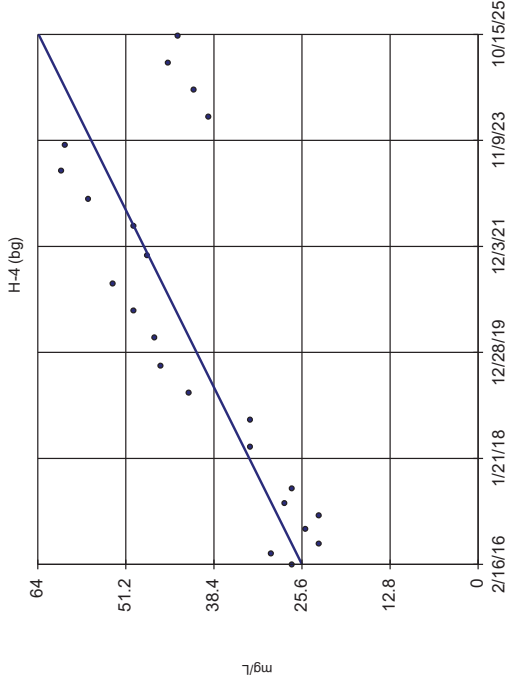
Constituent: Calcium Analysis Run 12/17/2025 8:06 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### Sen's Slope Estimator



Constituent: Chloride Analysis Run 12/17/2025 8:06 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### Sen's Slope Estimator

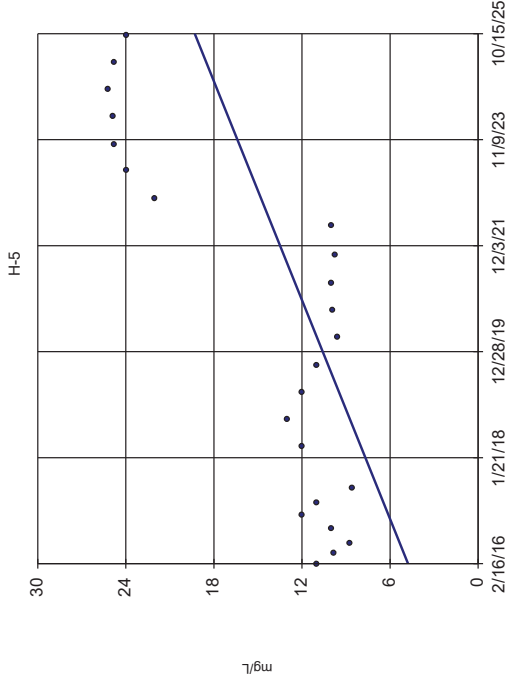


n = 23  
 Slope = 3.957  
 units per year.  
 Mann-Kendall  
 statistic = 143  
 critical = 89  
 Increasing trend  
 significant at 98%  
 confidence level  
 ( $\alpha = 0.01$  per  
 tail).

Constituent: Chloride Analysis Run 12/17/2025 8:06 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### Sen's Slope Estimator



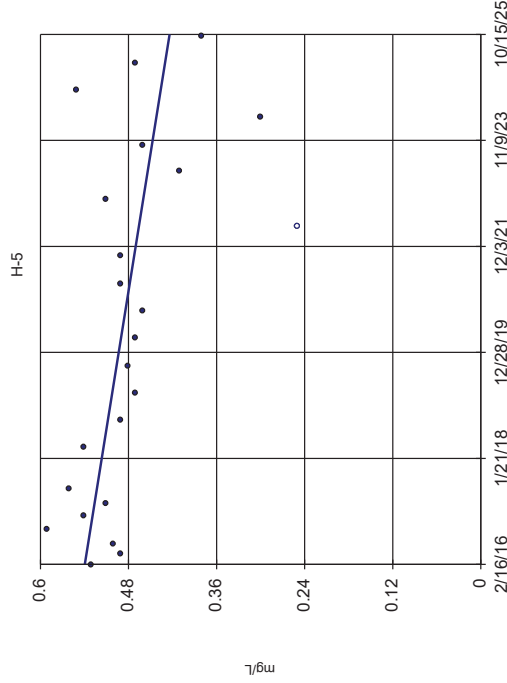
n = 23  
 Slope = 1.502  
 units per year.  
 Mann-Kendall  
 statistic = 114  
 critical = 89  
 Increasing trend  
 significant at 98%  
 confidence level  
 ( $\alpha = 0.01$  per  
 tail).

Constituent: Chloride Analysis Run 12/17/2025 8:06 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Follow symbols indicate censored values.

### Sen's Slope Estimator

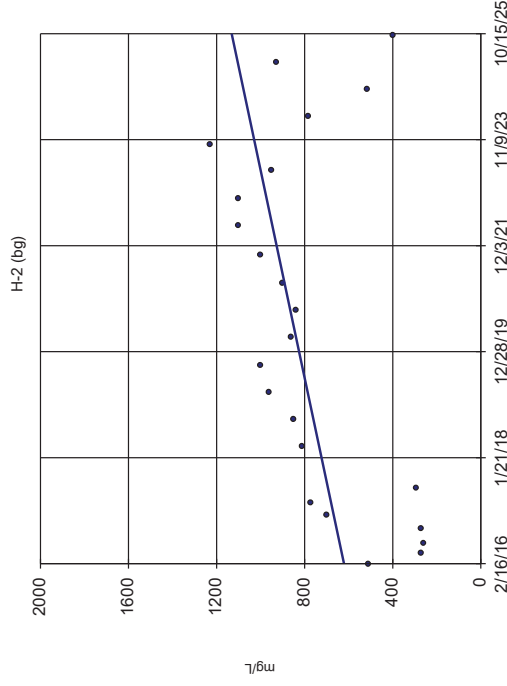


n = 23  
 Slope = -0.01194  
 units per year.  
 Mann-Kendall  
 statistic = -89  
 critical = 89  
 Decreasing trend  
 significant at 98%  
 confidence level  
 ( $\alpha = 0.01$  per  
 tail).

Constituent: Sulfate Analysis Run 12/17/2025 8:06 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

### Sen's Slope Estimator



n = 23  
 Slope = -52.71  
 units per year.  
 Mann-Kendall  
 statistic = -106  
 critical = 89  
 Increasing trend  
 significant at 98%  
 confidence level  
 ( $\alpha = 0.01$  per  
 tail).

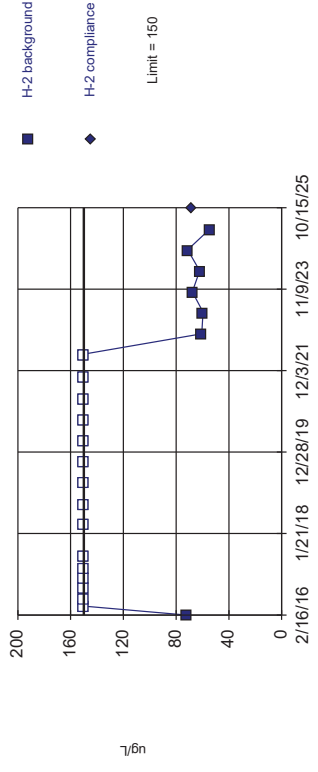
Constituent: Sulfate Analysis Run 12/17/2025 8:06 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015



Prediction Limit

Intrawell Non-parametric



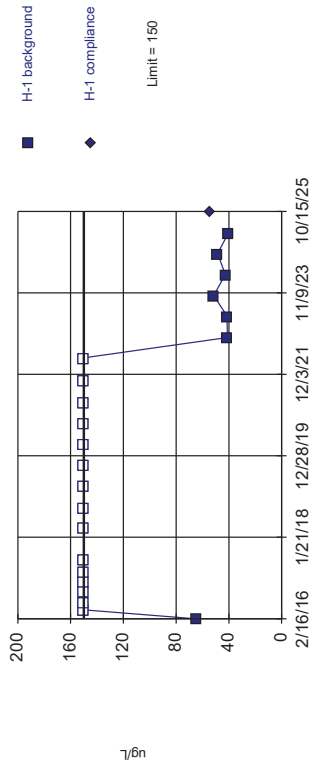
Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 22 background values. 68.18% NDs. Report alpha = 0.04348. Most recent point compared to limit. Insufficient data to test for seasonality: data were not deseasonalized.

Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Prediction Limit

Intrawell Non-parametric



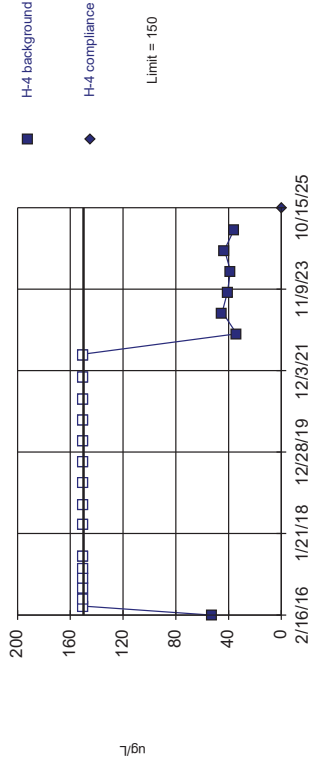
Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 22 background values. 68.18% NDs. Report alpha = 0.04348. Most recent point compared to limit. Insufficient data to test for seasonality: data were not deseasonalized.

Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Prediction Limit

Intrawell Non-parametric



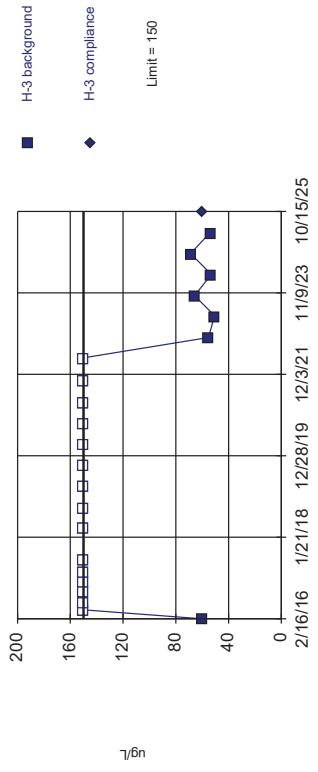
Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 22 background values. 68.18% NDs. Report alpha = 0.04348. Most recent point compared to limit. Insufficient data to test for seasonality: data were not deseasonalized.

Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Prediction Limit

Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 22 background values. 68.18% NDs. Report alpha = 0.04348. Most recent point compared to limit. Insufficient data to test for seasonality: data were not deseasonalized.

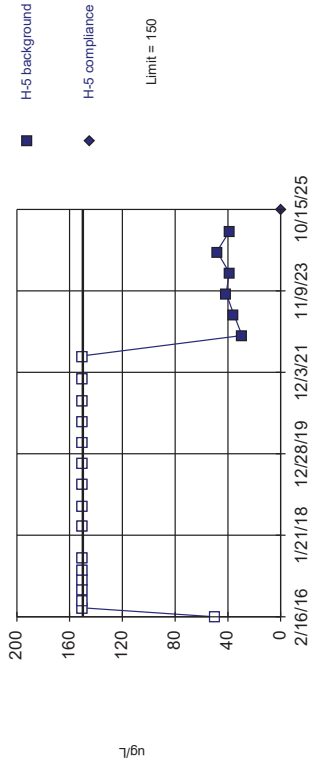
Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 22 background values. 72.73% NDs. Report alpha = 0.04348. Most recent point compared to limit. Insufficient data to test for seasonality: data were not deseasonalized.

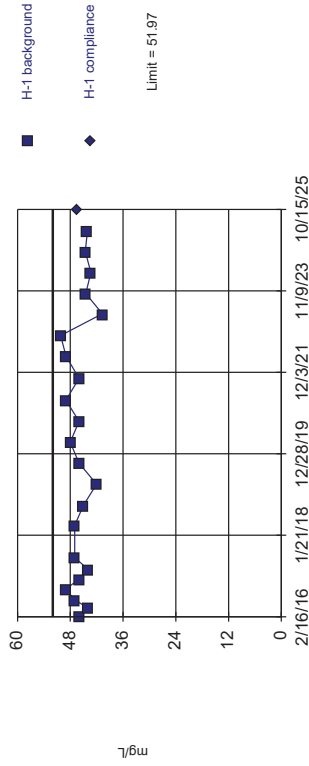
Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=45.84, Std. Dev.=2.383, n=22. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9753, critical = 0.911. Report alpha = 0.01. Most recent point compared to limit.

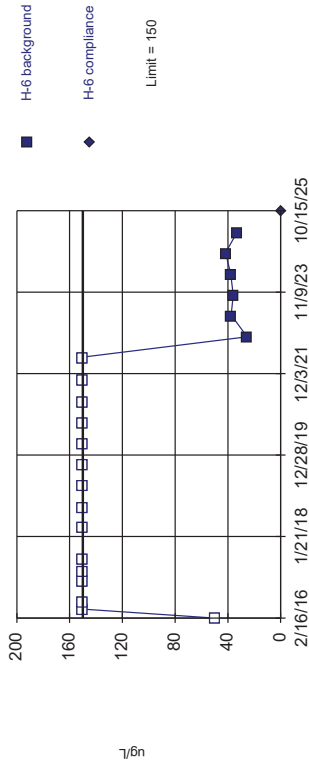
Constituent: Calcium Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 21 background values. 71.43% NDs. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality: data were not deseasonalized.

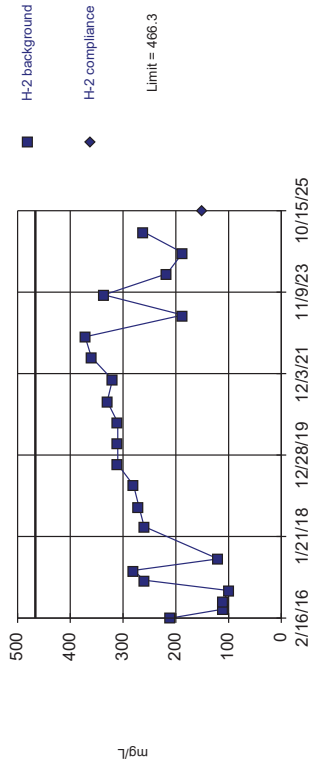
Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=250, Std. Dev.=84.02, n=22. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9212, critical = 0.911. Report alpha = 0.01. Most recent point compared to limit.

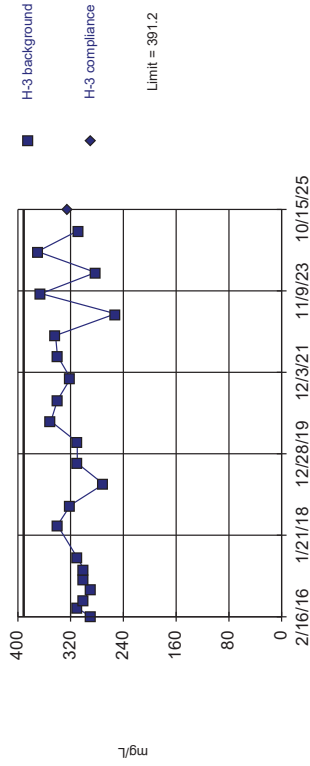
Constituent: Calcium Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric

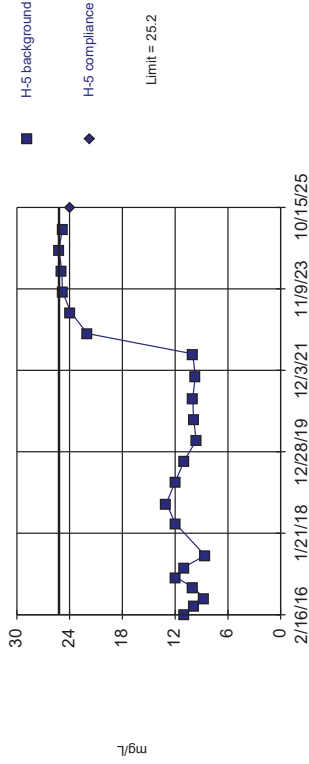




Within Limit

Prediction Limit

Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 22 background values. Report alpha = 0.04348. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

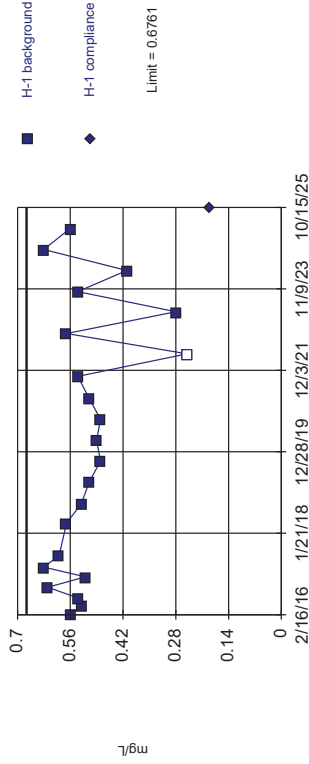
Constituent: Chloride Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary (based on cube transformation): Mean=0.1494, Std. Dev.=0.06199, n=22, 4.545% NDs. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9467, critical = 0.911. Report alpha = 0.01. Most recent point compared to limit.

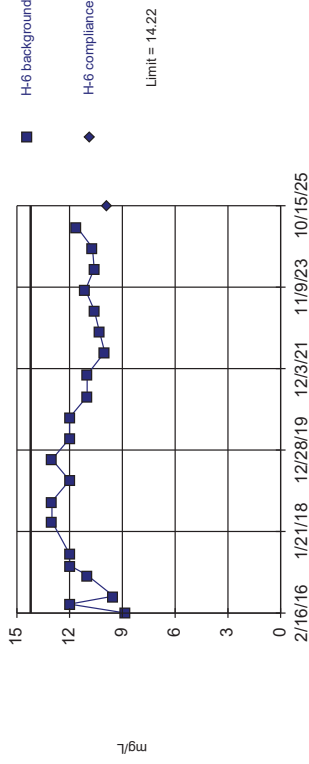
Constituent: Fluoride Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=11.3, Std. Dev.=1.13, n=21. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9514, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

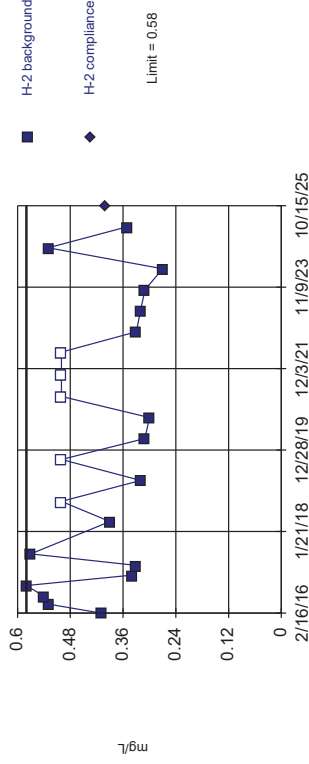
Constituent: Chloride Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric

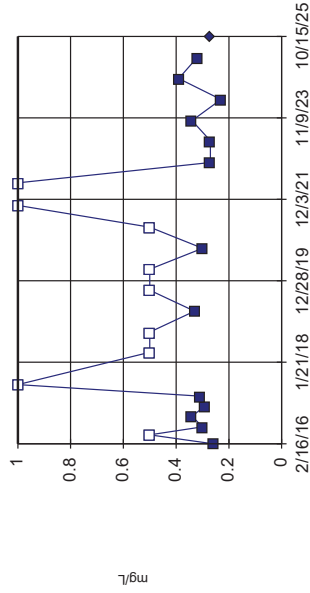


Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 22 background values, 22.73% NDs. Report alpha = 0.04348. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

Constituent: Fluoride Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

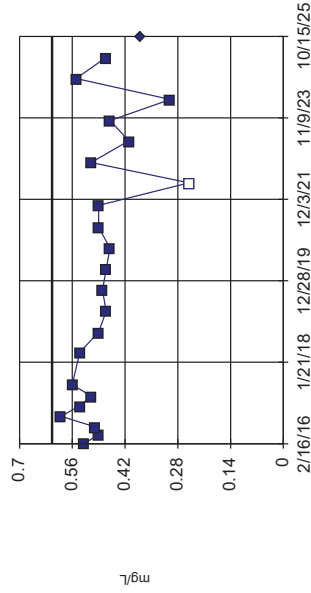
Within Limit  
Intrawell Non-parametric  
Prediction Limit



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 22 background values. 40.91% NDs. Report alpha = 0.04348. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

Constituent: Fluoride Analysis Run 12/17/2025 8:03 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

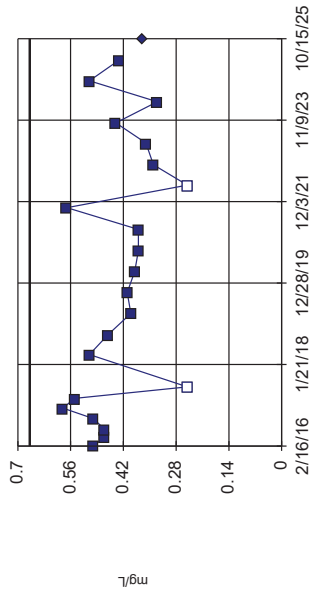
Within Limit  
Intrawell Parametric  
Prediction Limit



Background Data Summary (based on cube transformation): Mean=0.1182, Std. Dev.=0.04393, n=22, 4.545% NDs. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9452, critical = 0.911. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Fluoride Analysis Run 12/17/2025 8:03 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

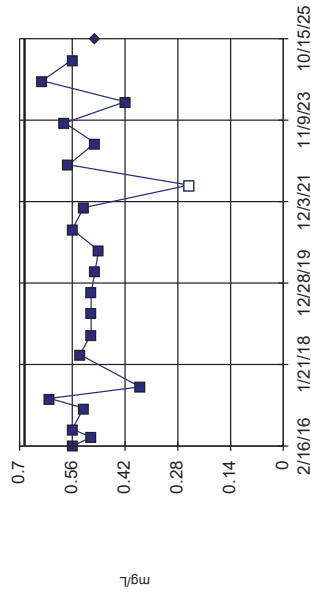
Within Limit  
Intrawell Parametric  
Prediction Limit



Background Data Summary: Mean=0.4309, Std. Dev.=0.09232, n=22, 9.091% NDs. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9675, critical = 0.911. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Fluoride Analysis Run 12/17/2025 8:03 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit  
Intrawell Parametric  
Prediction Limit



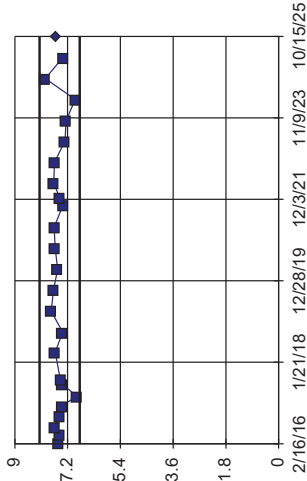
Background Data Summary (based on square transformation): Mean=0.2727, Std. Dev.=0.07676, n=21, 4.762% NDs. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9193, critical = 0.908. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Fluoride Analysis Run 12/17/2025 8:03 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limits

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=7.474, Std. Dev.=0.2389, n=24. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9372, critical = 0.916. Report alpha = 0.01. Most recent point compared to limit.

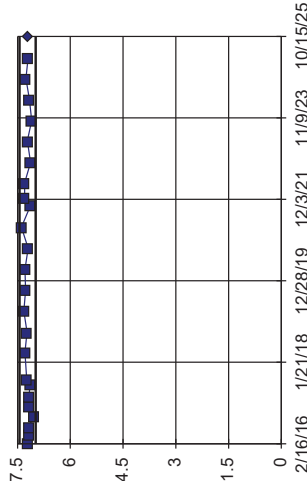
Constituent: pH Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limits

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=7.213, Std. Dev.=0.08012, n=24. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9862, critical = 0.916. Report alpha = 0.01. Most recent point compared to limit.

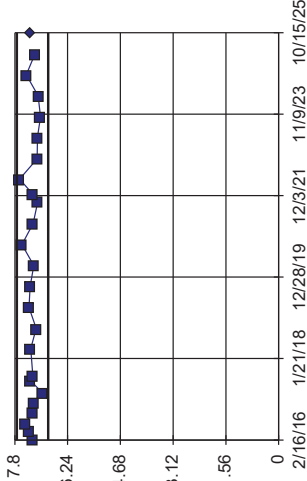
Constituent: pH Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limits

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=7.278, Std. Dev.=0.1622, n=24. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9627, critical = 0.916. Report alpha = 0.01. Most recent point compared to limit.

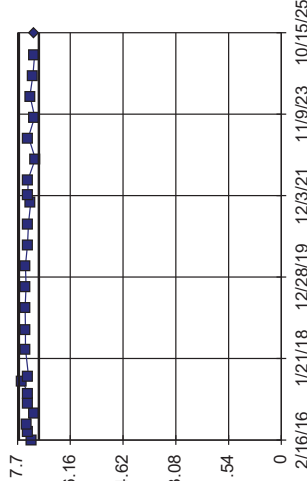
Constituent: pH Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limits

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=7.369, Std. Dev.=0.1025, n=24. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9292, critical = 0.916. Report alpha = 0.01. Most recent point compared to limit.

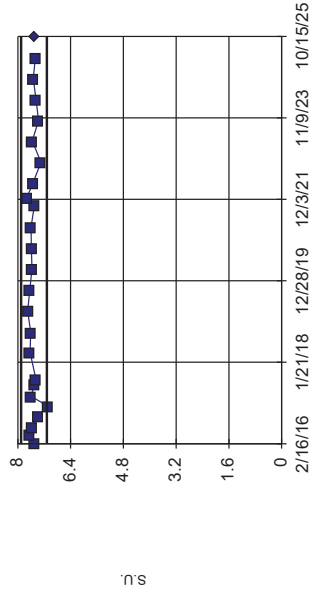
Constituent: pH Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limits

Prediction Limit

Intrawell Parametric



■ H-5 background  
 ◆ H-5 compliance  
 Limit = 7.902  
 Limit = 7.122

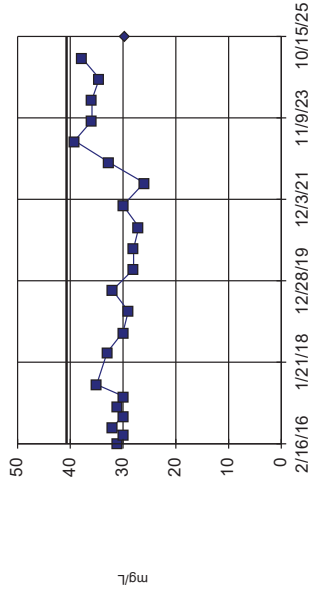
Constituent: pH Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



■ H-1 background  
 ◆ H-1 compliance  
 Limit = 40.72

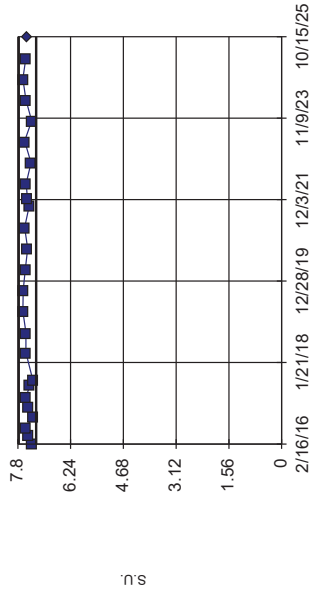
Constituent: Sulfate Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limits

Prediction Limit

Intrawell Parametric



■ H-6 background  
 ◆ H-6 compliance  
 Limit = 7.777  
 Limit = 7.258

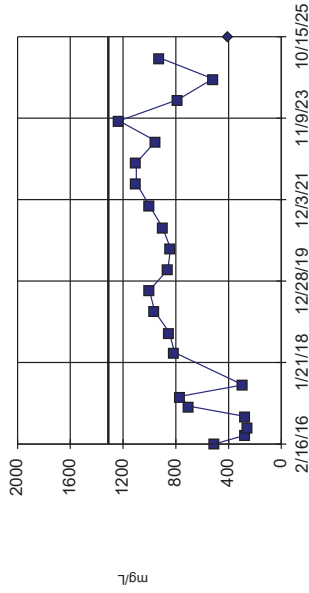
Constituent: pH Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



■ H-2 background  
 ◆ H-2 compliance  
 Limit = 1312

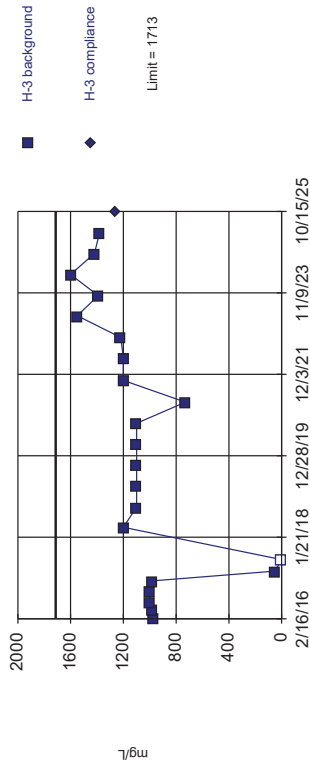
Constituent: Sulfate Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary (based on square transformation): Mean=127590, Std. Dev.=643828, n=22, 4.545% NDS. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9471, critical = 0.911. Report alpha = 0.01. Most recent point compared to limit.

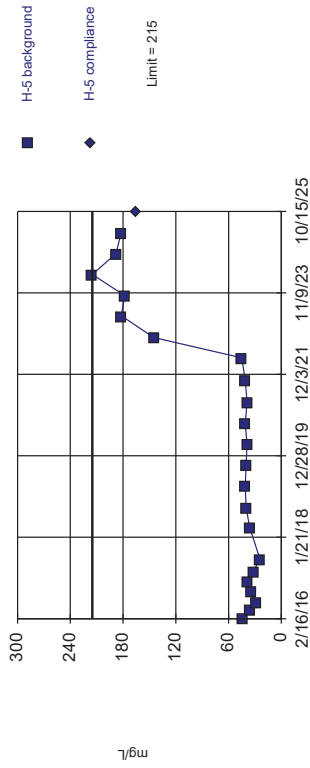
Constituent: Sulfate Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 22 background values. Report alpha = 0.04348. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

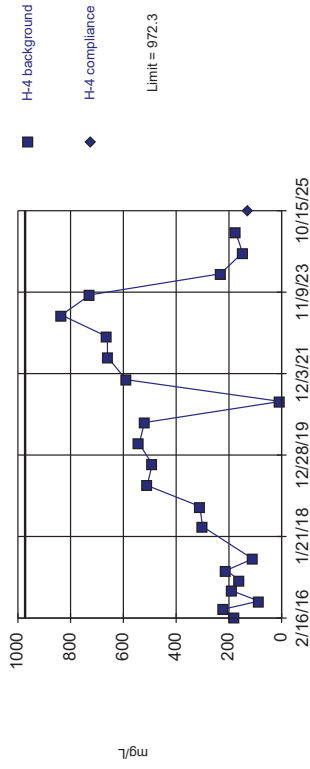
Constituent: Sulfate Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Parametric



Background Data Summary: Mean=357.2, Std. Dev.=238.9, n=22. Insufficient data to test for seasonality; data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9211, critical = 0.911. Report alpha = 0.01. Most recent point compared to limit.

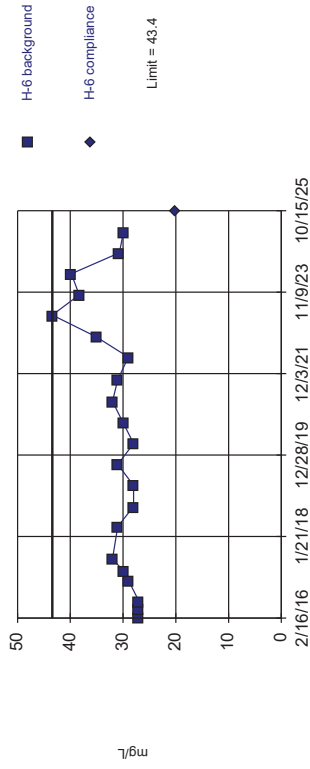
Constituent: Sulfate Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit

Intrawell Non-parametric



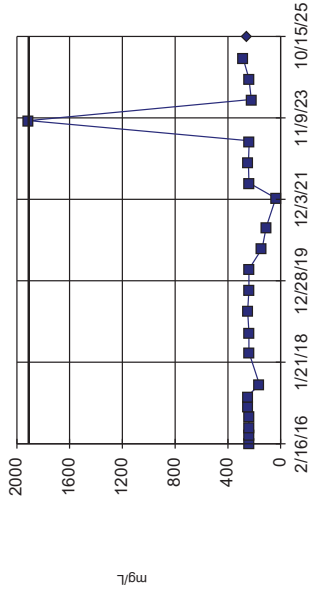
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 21 background values. Report alpha = 0.04545. Most recent point compared to limit. Insufficient data to test for seasonality; data were not deseasonalized.

Constituent: Sulfate Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Non-parametric



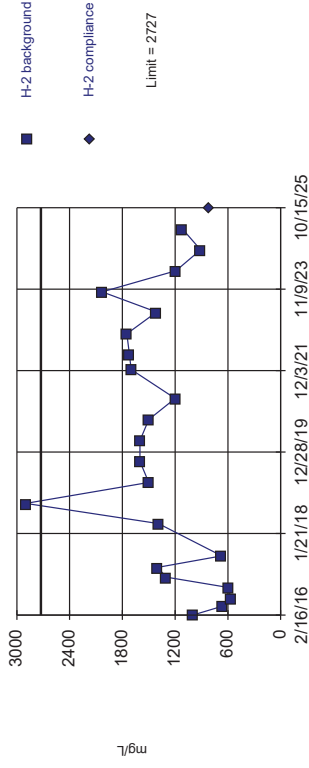
Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 22 background values. Report alpha = 0.04348. Most recent point compared to limit. Insufficient data to test for seasonality, data were not deseasonalized.

Constituent: Total Dissolved Solids Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Parametric



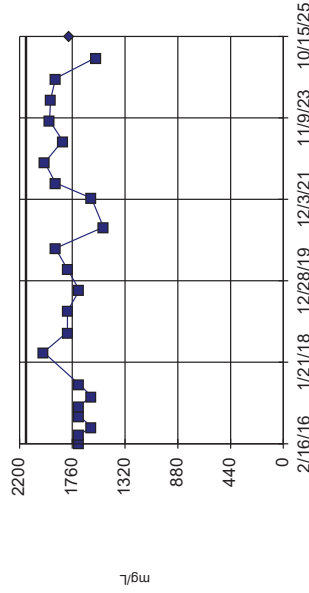
Background Data Summary: Mean=1350, Std. Dev.=534.8, n=22. Insufficient data to test for seasonality, data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9265, critical = 0.911. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Total Dissolved Solids Analysis Run 12/17/2025 8:03 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Parametric



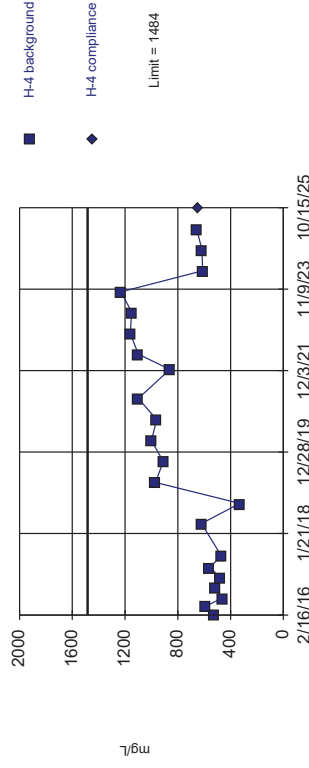
Background Data Summary: Mean=1767, Std. Dev.=147, n=22. Insufficient data to test for seasonality, data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9476, critical = 0.911. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Total Dissolved Solids Analysis Run 12/17/2025 8:04 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit  
Intrawell Parametric



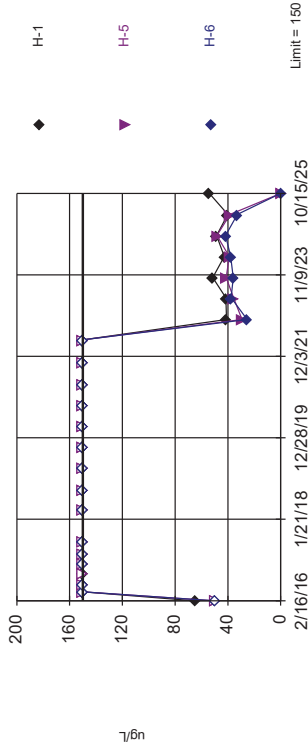
Background Data Summary: Mean=767.5, Std. Dev.=278.3, n=22. Insufficient data to test for seasonality, data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.05, calculated = 0.9129, critical = 0.911. Report alpha = 0.01. Most recent point compared to limit.

Constituent: Total Dissolved Solids Analysis Run 12/17/2025 8:04 AM

Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015



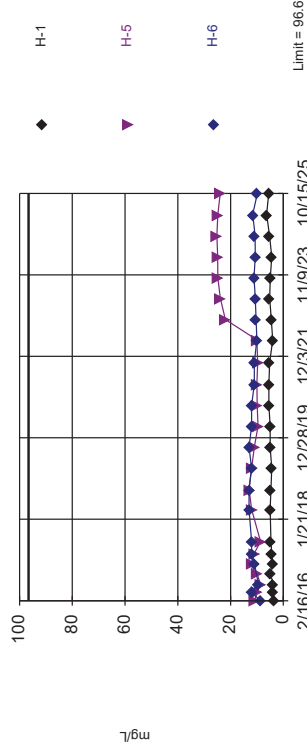
Within Limit  
Prediction Limit  
Interwell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 69 background values. Report alpha = 0.04167. Individual comparison alpha = 0.01409. Most recent point for each compliance well compared to limit. Seasonality was not detected with 95% confidence.

Constituent: Boron And Borates Only Analysis Run 12/17/2025 8:08 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

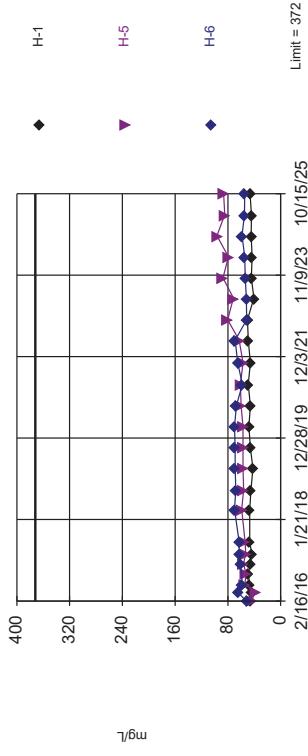
Within Limit  
Prediction Limit  
Interwell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Francia normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 69 background values. Report alpha = 0.04167. Individual comparison alpha = 0.01409. Most recent point for each compliance well compared to limit. Seasonality was not detected with 95% confidence.

Constituent: Chloride Analysis Run 12/17/2025 8:08 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

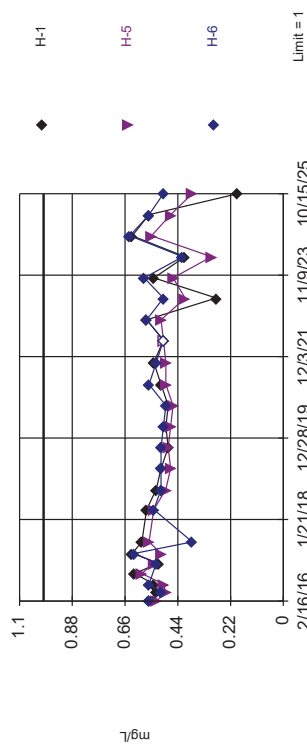
Within Limit  
Prediction Limit  
Interwell Non-parametric



Non-parametric test used in lieu of parametric prediction limit because the Shapiro Francia normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 69 background values. Report alpha = 0.04167. Individual comparison alpha = 0.01409. Most recent point for each compliance well compared to limit. Seasonality was not detected with 95% confidence.

Constituent: Calcium Analysis Run 12/17/2025 8:08 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limit  
Prediction Limit  
Interwell Non-parametric

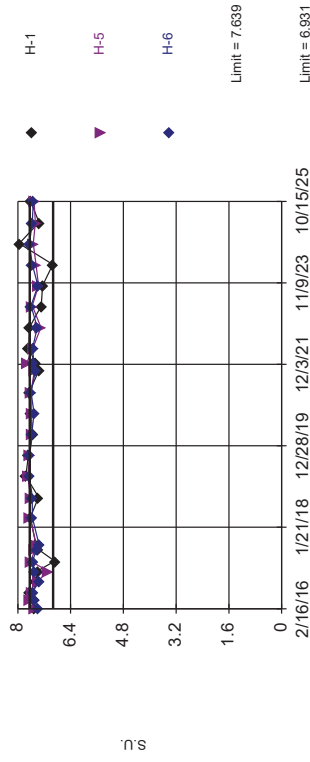


Non-parametric test used in lieu of parametric prediction limit because the Shapiro Francia normality test showed the data to be non-normal at the 0.05 alpha level. Limit is highest of 69 background values. 23.19% NDs. Report alpha = 0.04167. Individual comparison alpha = 0.01409. Most recent point for each compliance well compared to limit. Seasonality was not detected with 95% confidence.

Constituent: Fluoride Analysis Run 12/17/2025 8:08 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Santitas Export 20251015

Within Limits

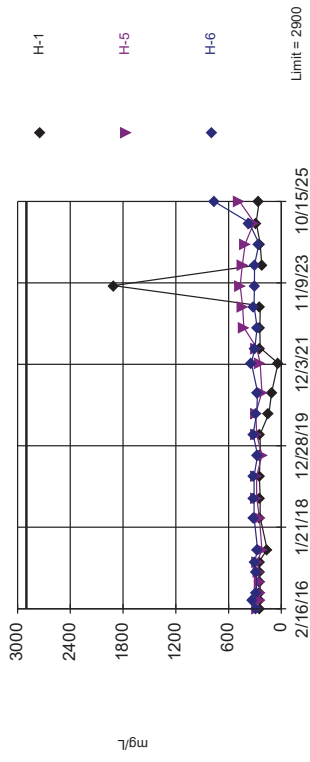
Prediction Limit  
Interwell Parametric



Constituent: pH Analysis Run 12/17/2025 8:08 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

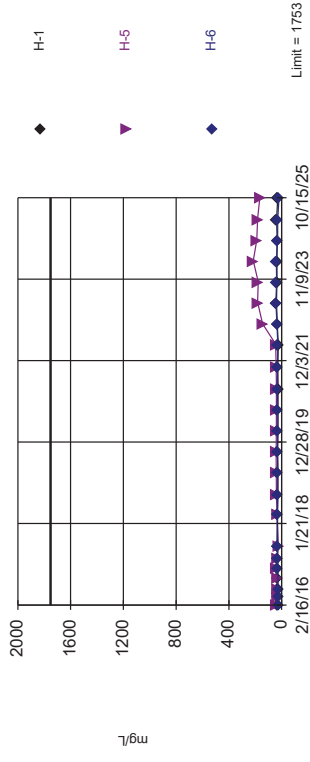
Prediction Limit  
Interwell Non-parametric



Constituent: Total Dissolved Solids Analysis Run 12/17/2025 8:08 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

Within Limit

Prediction Limit  
Interwell Parametric



Constituent: Sulfate Analysis Run 12/17/2025 8:08 AM  
Holcomb Station CCR LF Client: Sunflower Electric Power Corp. Data: Sanitas Export 20251015

**ATTACHMENT 5**

**FIELD DATA SHEETS**

**SUNFLOWER ELECTRIC POWER CORPORATION  
HOLCOMB STATION INDUSTRIAL LANDFILL  
SOLID WASTE PERMIT NO. 420  
WELL DATA**

WELL ID	DATE	TIME	TOC <sup>1</sup> (Elevation, FT-MSL)	DTW <sup>2</sup> (Feet)	SWL <sup>3</sup> (Elevation FT-MSL)	WELL T.D. <sup>4</sup>
H1	10/9/2025	8:19	2,924.54	234.3	2,690.24	2638.93
H2	10/9/2025	8:38	2,914.71	216.3	2,698.41	2622.18
H3	10/9/2025	8:50	2,905.93	207.7	2,698.23	2632.16
H4	10/9/2025	9:02	2,901.66	206.4	2,695.26	2635.04
H5	10/9/2025	9:39	2,896.67	202.4	2,694.27	2637.14
H6	10/9/2025	9:21	2,940.37	250	2,690.37	2642.48
SS1	10/9/2025	8:23	2,923.93	91	2,832.93	2812.01
DD3	10/9/2025	8:32	2,941.22	96.8	2,844.42	2779.09
S4	10/9/2025	9:29	2,946.17	129	2,817.17	2813.47
<b>BASIN</b>	-	-	-	-	-	-

<sup>1</sup>TOC = Top of casing - plant datum; all wells surveyed by a licensed professional land surveyor (Cornerstone) in March 2006 and July 2008

<sup>2</sup>DTW = Depth to water - measurements are to be taken before placing hydrasleeve in well.

<sup>3</sup>SWL = Static water level = TOC elevation - DTW

<sup>4</sup>Well total depth is measured unless noted by (\*) which indicates a depth based on well consumption report.

**Well inspection observations: (pad condition, security, etc.) See attached inspection sheet**

**SAMPLE COLLECTOR(S): Kandi George & Jennifer Leach**

<b>SUNFLOWER ELECTRIC POWER CORPORATION  HOLCOMB STATION INDUSTRIAL LANDFILL  SOLID WASTE PERMIT NO. 420  SAMPLE COLLECTION DATA</b>						
WELL ID	DATE	TIME	CONDUCTIVITY	TURBIDITY	pH	TEMP (F)
H1	10/15/2025	9:40	534	0.49	7.61	74.9
H2	10/15/2025	9:50	1298	6.28	7.36	74.8
H3	10/15/2025	10:05	2369	9.78	7.2	74
H4	10/15/2025	10:20	977	0.95	7.2	73
H5	10/15/2025	11:10	780	1.29	7.51	69.2
H6	10/15/2025	10:30	590	1.17	7.53	71

pH, Conductivity, Turbidity and Temperature will be recorded using sample from hydrasleeve

Weather conditions (air temp, precipitation, wind direction): Sunny, 62-68°F, 0 precipitation, Wind S 13-18 mph

Unusual conditions and deficiencies, equipment malfunctions, etc.: Conductivity & pH taken in the field, temperature & turbidity tested in HLS lab

SAMPLE COLLECTOR(S): Jeff Lyons - pH, temp, conductivity, turbidity  
Kandi George & Jennifer Leach - Samples sent to lab

**LANDFILL MONITORING WELLS  
SEMI-ANNUAL INSPECTION LOG**

DATE: 10/15/2025

Well Casing	Concrete Pad	Protection Riser	Locking Device \ Condition	Casing Plug / Cap
SS1 S4 DD3 H1 H2 H3 H4 H5 H6	X X X X X X X X X	X X X X X X X X X	X X X X X X X X X	X X X X X X X X X

**Comments:** All well casings, concrete pads, and protection risers in good condition except on well #DD3. This well is missing the lock and the protection riser will not close completely because the well casing inside is taller than the riser. The casing is plugged with a cap inside the protection riser.

Inspected by: Kandi Gears #1009 Signature

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 10/15/25 / 9:40am

WELL I.D. H1 STATIC DEPTH 234.3

LOCATION: HOLCOMB STATION CCR LANDFILL

ANALYSIS: CCR, APPENDIX III PARAMETERS

ALL DEVICES CALIBRATED Y OPER JL

pH 7.61 CONDUCTIVITY 534

TURBIDITY 0.49 TEMPERATURE 74.9°F

AMBIENT TEMP/CONDITIONS \_\_\_\_\_

67° sunny 13 mph S wind

COMMENTS turbidity & temp taken in lab  
@ 11:25am

SAMPLED BY Kandi George / Jennifer Leach  
& Jeff Lyons

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 10/15/25 / 9:50

WELL I.D. H2 STATIC DEPTH 210.3

LOCATION: HOLCOMB STATION CCR LANDFILL

ANALYSIS: CCR, APPENDIX III PARAMETERS

ALL DEVICES CALIBRATED \_\_\_\_\_ OPER \_\_\_\_\_

pH 7.36 CONDUCTIVITY 1298

TURBIDITY 0.28 TEMPERATURE 74.8°F

AMBIENT TEMP/CONDITIONS \_\_\_\_\_

102°F Sunny 15 mph S wind

COMMENTS turbidity <sup>temp</sup> ~~of~~ ~~total~~ taken in lab  
10/11/25 am

SAMPLED BY Kandi George / Jennifer /  
Jeff Lyons

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 10/15/25 / 10:05

WELL I.D. H3 STATIC DEPTH 207.7

LOCATION: HOLCOMB STATION CCR LANDFILL

ANALYSIS: CCR, APPENDIX III PARAMETERS

ALL DEVICES CALIBRATED \_\_\_\_\_ OPER \_\_\_\_\_

pH 7.20 CONDUCTIVITY 2309

& 9.18  
TURBIDITY 3.90 TEMPERATURE 73.09 74°F

AMBIENT TEMP/CONDITIONS \_\_\_\_\_

64°F sunny 10 mph S wind

COMMENTS turbidity & temp taken in lab  
@ 11:24am

SAMPLED BY Rachel George / Jennifer Leach /  
Jeff Lyons

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 10/15/25 / 10:20am

WELL I.D. H4 STATIC DEPTH 206.4

LOCATION: **HOLCOMB STATION CCR LANDFILL**

ANALYSIS: **CCR, APPENDIX III PARAMETERS**

ALL DEVICES CALIBRATED \_\_\_\_\_ OPER \_\_\_\_\_

pH 7.20 CONDUCTIVITY 477

TURBIDITY 0.95 TEMPERATURE 73°F

AMBIENT TEMP/CONDITIONS \_\_\_\_\_

66°F sunny 15 mph wind S

COMMENTS turbidity & temp taken in lab  
@ 11:21am

SAMPLED BY Kandi George / Jennifer Brown /  
Jeff Lyons

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 10/15/25 / 11:10am

WELL I.D. H5 STATIC DEPTH 202.4

LOCATION: HOLCOMB STATION CCR LANDFILL

ANALYSIS: CCR, APPENDIX III PARAMETERS

ALL DEVICES CALIBRATED \_\_\_\_\_ OPER \_\_\_\_\_

pH 7.51 CONDUCTIVITY 780

TURBIDITY 1.29 TEMPERATURE 69.2° F

AMBIENT TEMP/CONDITIONS \_\_\_\_\_

71° F Sunny 18mph wind S

COMMENTS turbidity & temp taken at Lab  
@ 11:15am

SAMPLED BY Kandi George / Kimmberly  
Jeff Lyons

HOLCOMB STATION SWL FIELD DATA

DATE/TIME 10/15/25 / 11:30am

WELL I.D. H6 STATIC DEPTH 250

LOCATION: **HOLCOMB STATION CCR LANDFILL**

ANALYSIS: **CCR, APPENDIX III PARAMETERS**

ALL DEVICES CALIBRATED \_\_\_\_\_ OPER \_\_\_\_\_

pH 7.53 CONDUCTIVITY 590

TURBIDITY 1.17 TEMPERATURE 71°F

AMBIENT TEMP/CONDITIONS \_\_\_\_\_

68°F, sunny 10 mph winds

COMMENTS turbidity & temp taken @ Lab  
at 11:15am

SAMPLED BY Kandi George / Jennifer Brown /  
Jeff Lyons