APACHE COUNTY COMMUNITY DEVELOPMENT
P.O. Box 238
75 West Cleveland
St. Johns, Arizona 85936
(928) 337-7526 • Fax (928) 337-7633

Director:
Matthew Fish

Senior Staff
Plan Reviewer:
Shaunna Pearce

July 22, 2026,

To: Apache County Planning & Zoning Commission

From: Matthew Fish, Community Development Director

RE: Conditional Use Permit 2026-26 SRP Energy Dome

Staff Report

Applicant: Pew & Lake, PLC, on behalf of Salt River Project (SRP)

Project: Energy Dome Long-Duration Energy Storage Research & Development Project

PROJECT PURPOSE

A significant distinction of this application is that the proposed facility is intended primarily for research and development.

According to the applicant, Salt River Project selected Energy Dome's technology through a competitive evaluation process to better understand long-duration energy storage systems capable of providing approximately ten hours of electrical storage. Information obtained through operation of the facility will assist SRP in evaluating future energy storage technologies as electrical utilities continue transitioning toward increasingly diverse energy portfolios.

The project is intended to:

- Evaluate operational performance;
- Demonstrate emerging long-duration energy storage technology;
- Collect engineering and operational data;
- Support research into future electrical grid reliability;
- Advance understanding of non-inverter-based energy storage systems.

Community Development finds these objectives distinguish the proposal from commercial energy storage developments.

BACKGROUND

The Coronado Generating Station has operated as one of Apache County's principal electrical generation facilities for many years.

Rather than developing a new industrial site elsewhere in Apache County, SRP proposes locating this research facility entirely within its existing industrial complex where:

- industrial infrastructure already exists;
- electrical interconnections are available;
- security is established;
- drainage systems already function;
- utility corridors are present; and
- access roads have served the generating station for decades.

Because the proposed research facility is integrated into an existing industrial operation, staff finds the project minimizes impacts that would otherwise accompany development of a new industrial site.

PROJECT DESCRIPTION

The proposed project consists of approximately 19 megawatts of long-duration energy storage utilizing Energy Dome's proprietary CO_2 Battery technology.

Unlike conventional lithium-ion battery facilities, the proposed technology stores energy by compressing carbon dioxide into liquid form and later expanding the CO_2 through a turbine to generate electricity. The process operates as a **closed-loop system**, meaning the carbon dioxide remains within the system during normal operation rather than being released into the atmosphere.

The proposed improvements include:

- CO_2 storage dome
- Thermal energy storage tank
- Turbine-generator equipment
- Compressors
- Equipment containers
- Internal utility connections
- Permanent security fencing
- Existing electrical interconnections

APACHE COUNTY COMPREHENSIVE PLAN ANALYSIS

The Apache County Comprehensive Plan encourages:

- continued investment in critical infrastructure;
- responsible industrial development;
- economic diversification;
- technological innovation;
- research supporting future energy production;
- efficient use of existing industrial sites; and
- minimizing unnecessary disturbance of undeveloped lands.

Community Development finds this proposal strongly supports these objectives.

Unlike many energy projects requiring development of previously undeveloped property, this proposal places a research facility entirely within an existing industrial generating station that has historically served Apache County as a major energy producer.

The proposal therefore represents an efficient reuse of existing industrial infrastructure while advancing technological innovation.

Staff finds the request consistent with the Apache County Comprehensive Plan.

ARTICLE 11 STAFF ANALYSIS

Research and Development Nature

The central purpose of this application is research and development.

Community Development finds that the project is fundamentally different from commercial utility-scale energy developments because its primary objective is technology evaluation rather than commercial electrical production.

This distinction significantly reduces long-term land use concerns normally associated with large-scale energy projects.

Staff Finding: Meets the intent of Article 11.

Compatibility

The project is located entirely within an existing industrial electrical generating station.

No surrounding land uses will change.

No expansion beyond the existing Coronado Generating Station boundary is proposed.

Staff Finding: Meets the criterion.

Traffic

Construction activity is expected to average approximately six truck trips per day.

Routine operations will involve only a small number of employees.

Traffic impacts are negligible.

Public Infrastructure

The project utilizes:

- existing roads;
- existing utilities;
- existing electrical interconnections;
- existing drainage systems;
- existing security infrastructure.

No additional public infrastructure is required.

Staff Finding: Meets the criterion.

Public Cost

The project creates no additional demand for County infrastructure or public services.

Staff Finding: Meets the criterion.

Environmental Compatibility

The proposed technology operates as a closed-loop carbon dioxide system.

Operational emissions are minimal.

Water requirements are largely limited to an initial system fill utilizing the existing Coronado Generating Station water supply. Existing drainage facilities will continue serving the project.

Agency Review

The Arizona State Land Department reviewed the proposal and submitted a formal Letter of No Objection supporting the project proceeding as proposed.

Community Development also determined an ADOT access permit was unnecessary because the project will continue utilizing existing access roads that have served the generating station for decades.

STAFF FINDINGS

Community Development finds:

1. The application satisfies Article 11 submission requirements.
2. The project is a research and development facility intended to evaluate emerging long-duration energy storage technology.
3. The proposal is not a commercial utility-scale battery energy storage project.
4. The project will be located entirely within the existing industrial boundaries of the Coronado Generating Station.
5. Existing infrastructure adequately serves the project.
6. Traffic impacts are minimal.
7. The proposal is consistent with the Apache County Comprehensive Plan.
8. The Arizona State Land Department has expressed no objection to the project.

STAFF RECOMMENDATION

Community Development has reviewed the Conditional Use Permit application, supporting technical documents, project narrative, agency correspondence, and all other materials submitted by the applicant. Staff has evaluated the request for consistency with the applicable provisions of Article 11 of the Apache County Zoning Ordinance, the Apache County Comprehensive Plan, and all applicable County review standards.

Based upon this review, Community Development finds that the applicant has satisfied the application requirements and has demonstrated that the proposed Research and Development Facility meets the threshold for consideration under the Conditional Use Permit provisions of the Apache County Zoning Ordinance.

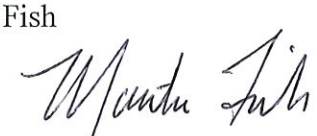
Accordingly, Community Development forwards this application to the Planning and Zoning Commission for its evaluation and recommendation to the Apache County Board of Supervisors. In making its recommendation, the Commission should consider the evidence presented, the applicable provisions of the Apache County Zoning Ordinance, the Apache County Comprehensive Plan, and any testimony received during the public hearing.

RECOMMENDED CONDITIONS OF APPROVAL

1. Development shall substantially conform to the submitted site plan and project narrative.
2. Dust shall be controlled during construction.

3. All applicable Federal, State, County, Fire Code, and Building Code requirements shall be met prior to operation.
4. Appropriate hazardous material handling and emergency response plans shall be maintained in accordance with applicable regulations.

Matthew Fish



Apache County Community Development

APACHE COUNTY — Community Development Department
P.O. Box 238 • St. Johns, AZ 85936 • Phone: (928) 337-7526 • Fax: (928) 337-7633

CONDITIONAL USE PERMIT APPLICATION

APPLICANT

Name Pew & Lake, PLC- Reese Anderson

Mailing Address 1744 S. Val Vista Dr. Suite 217
Mesa, AZ 85204

Contact Person Reese Anderson / Sarah Prince

Phone 480-461-4670 Fax _____

Email reese.anderson@pewandlake.com/sarah.prince@pewandlake.com

PROPERTY INFORMATION

Assessor's Parcel # N/A Township 14N Range 29E
Section 33

Subdivision _____

Unit # _____ Lot # _____

Address/Location 32060 S. HWY 191, ST. JOHNS, AZ 85936

Existing Zoning _____

Existing Land Use Industrial

Lot Size 30 acres

CONDITIONAL USE PERMIT REQUEST

Please provide a brief description of the request.

Non-inverter based long-duration energy storage pilot facility on approximately 30 acres within Coronado Generating Station

Temporary Use: ___ Yes x No

SUBMITTAL CHECKLIST

- ☑ Pre-application meeting with a staff planner.
- ☑ A non-refundable filing fee.
- ☑ Proof of Ownership.
- ☑ Application, photographs, diagrams, site plans with the setbacks noted, drainage report and any other required information. Please be precise and detailed.
- ☑ Citizen Review Process as listed in ordinance Section 1106. A list of names and addresses of all the property owners within 300 feet of subject property.
- ☑ ADOT permit granting ingress / egress access
- ☑ Map to property.
- ☑ All required items need to be submitted to Planning & Zoning at least 30 days prior to the next scheduled meeting.

CERTIFICATION & SIGNATURE

Submittal of this application constitutes consent of the applicant in granting the Community Development Department access to the subject property during the course of project review. No further consent or notice shall be required.

I hereby certify that the information in this application is correct and agree to abide by the regulations of this jurisdiction.

Signature of Applicant

_____ Date 04/22/26

Signature of Property Owner (if not the applicant)

_____ Date 4/29/26

OFFICE USE ONLY

Received By _____ Date 4-30-26

Receipt # _____ Fee $300 —

Permit # 2026-26

Related Cases _____

Appeal Filed By _____ Date _____

Receipt # _____ Fee _____

COMMISSION ACTION

☐ Approved ☐ with Conditions ☐ Denied

Resolution # _____ Date _____

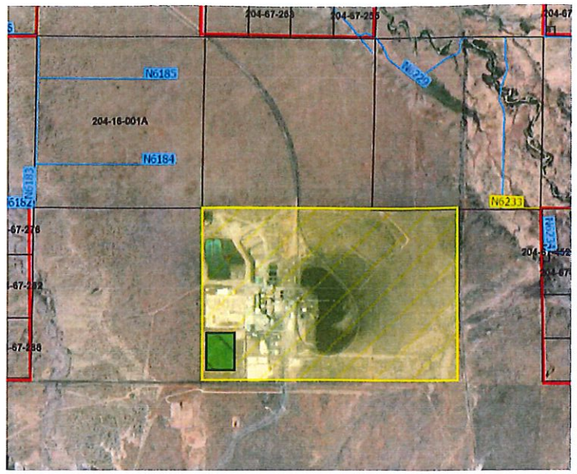
Chairman _____ Date _____

BOARD ACTION

☐ Approved ☐ with Conditions ☐ Denied

Ordinance # _____ Date _____

Supervisor _____ Date _____



SRP Owned Land
Project Area

Salt River Project & Energy Dome – Apache County
Conditional Use Permit
Pre-Application Project Narrative

Submitted by
Pew & Lake, PLC.
Reese Anderson / Sarah Prince
480-461-4670
Reese.anderson@pewandlake.com / sarah.prince@pewandlake.com

On Behalf of
Salt River Project
Ellie Griesemer
602-236-6798
Ellie.griesemer@srpnet.com

February 26, 2026

Project Overview

Salt River Agricultural Improvement and Power District (SRP) is a community-based, not-for-profit organization providing affordable water and power to more than two million people in central Arizona. SRP has been serving the Phoenix area for more than a century to meet the needs of customers and to help develop it into one of the nation's most vibrant regions. As a public not-for-profit water and energy utility company, SRP acts in the best interest of the people it serves and strives to help build a better future for Arizona.

SRP is experiencing record growth, with SRP's Integrated System Plan predicting the need to double or triple the amount of generating resources by 2035. This growth, combined with increasing interest from large customers in carbon-free energy and SRP's commitment to reducing carbon intensity, is driving the need to add significant carbon-free resources to its generation portfolio. SRP aims to reduce its carbon intensity by 82% by 2035, relative to a 2005 baseline, and reach net-zero carbon emissions by 2050.

To continue providing reliable and sustainable power while meeting these goals, SRP plans to significantly expand its solar and battery energy storage capacity, with a particular focus on long-duration energy storage starting in the early 2030s. Unlike lithium-ion batteries that typically provide up to 4 hours of discharge, long-duration energy storage systems offer 8+ hours of capacity, enabling reliable overnight power and better alignment with solar generation cycles. Many long-duration energy storage technologies also offer inherent grid-stabilizing properties like real inertia and fault current contribution—advantages that inverter-based systems often lack. These traits are especially valuable for enhancing reliability and resilience in grids increasingly powered by intermittent renewables.

SRP solicited proposals for a non-inverter based long-duration energy storage pilot facility and selected Energy Dome's 19MW, 10-hr CO_2 Battery project. The Energy Dome technology stores energy by compressing CO_2 into a liquid stored in high pressure tanks. The system discharges energy by expanding the CO_2 back into a gas through a turbine in a closed-loop system, with the CO_2 gas stored in a large inflatable dome. This pilot project will advance SRP's understanding of long duration energy storage technologies and support the utility's sustainability goals, while also accelerating the maturity and commercialization of Energy Dome's technology.

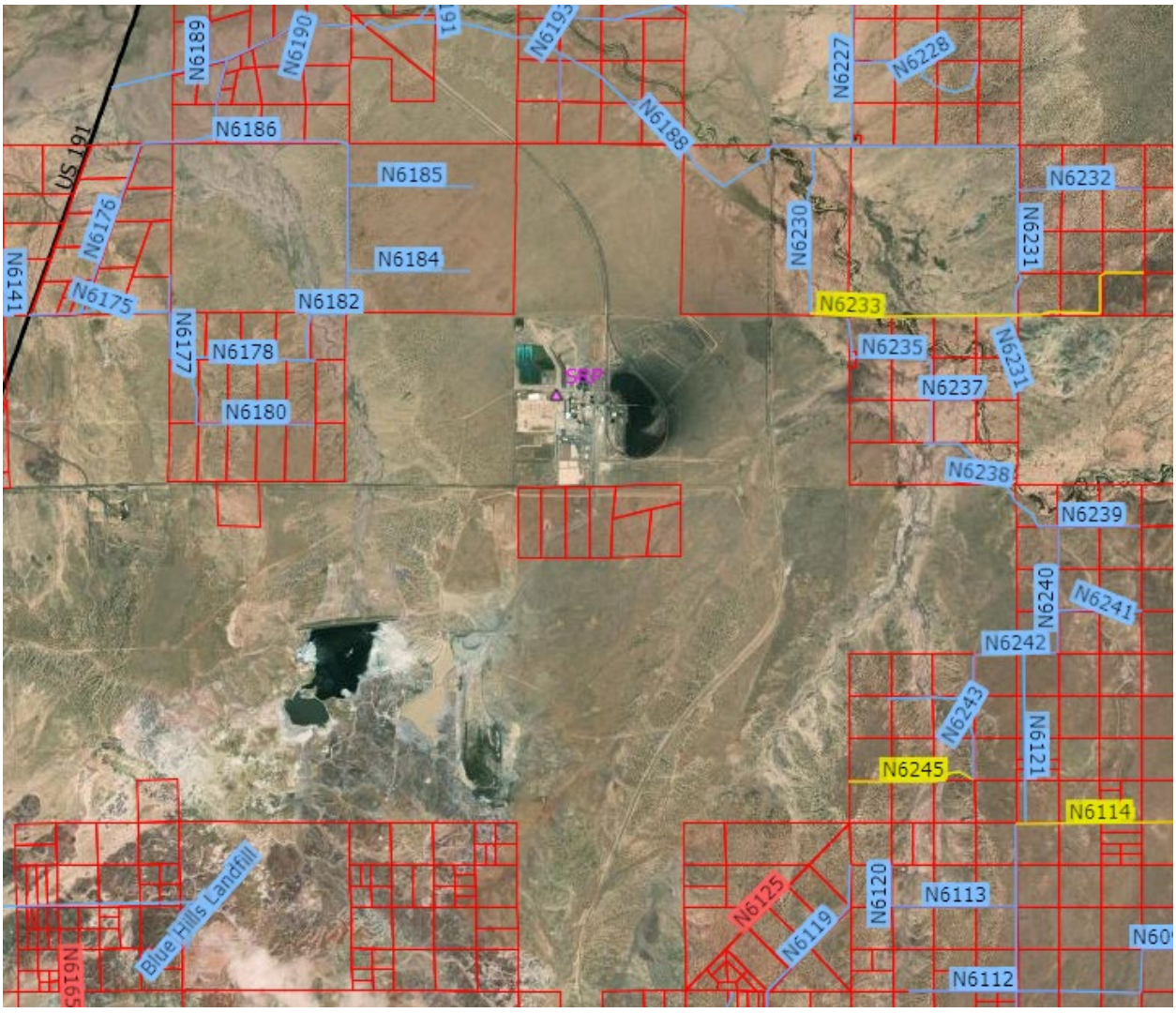
The project will be located at Coronado Generating Station (CGS), requiring Energy Dome to execute a Ground Lease Agreement with SRP governing the location of the project on the SRP-owned site. The project will occupy approximately 30 acres within CGS and will interconnect to the grid via an existing SRP-owned transformer.

SRP and Energy Dome are demonstrating thoughtful site planning and efficient water management while collaboratively advancing an innovative long-duration energy storage technology. This pilot positions SRP to meet future energy demands while contributing to Arizona's transition to a secure and sustainable energy future.

Existing Site Conditions

The site is approximately equal portions of lightly vegetated land, cleared & undeveloped land, and paved overflow parking & access roads. There are lateral concrete drainage ditches extending into the site that connect to the main ditch, which follows the north-south roadway. The lateral ditches currently divert runoff from the parking lot and will remain in place to divert water from the proposed project. The parking lot is approximately 4-6" of concrete and has 9 lighting structures with buried electrical lines that will be removed. **Image 1** below provides an aerial of the SRP site and surrounding area.

Image 1 – Site Aerial



Request to Apache County

The applicant is requesting a Conditional Use Permit to allow for the use of a non-inverter-based long-duration energy storage pilot facility on approximately 30 acres within the SRP owned site. The

applicant understands the evaluation criteria and general standards of requesting a CUP and has outlined compliance with the criteria and standards below.

1. **The proposed use will be harmonious and in accordance with the general and specific objectives of the Apache County Comprehensive Plan and any subarea plans.**
    - ✓ The proposed development is within the Salt River Project power plant property and will be harmonious and in accordance with the area.
2. **The proposed use will be designed, constructed, operated, and maintained so as to be harmonious and appropriate in appearance with the existing or intended character of the general vicinity.**
    - ✓ The proposed use will be designed, constructed, operated and maintained to be compatible with the character of the general vicinity.
3. **The traffic generated by the proposed use shall be mitigated so as not to burden the traffic circulation system in the vicinity.**
    - ✓ The traffic during construction is about 6 trucks per day. After construction, the traffic is even less.
4. **The proposed use will be adequately served by facilities and services such as highways, roads, law enforcement, fire protection, storm water drainage, refuse disposal, domestic water and sanitary sewers, and schools, or those persons or agencies responsible for the establishment of the proposed use shall provide adequate services.**
    - ✓ The proposed use will be adequately served by facilities and services.
5. **The proposed use will not create any additional requirements at public cost for public facilities and services.**
    - ✓ The proposed use will not create any additional requirements at public cost for public facilities and services.
6. **The proposed use will not involve uses, activities, processes, materials, equipment, and conditions of operation that will be detrimental to any persons, property, or general welfare by reasons of excessive production of traffic, noise, smoke, fumes, vibration, glare, or odors.**
    - ✓ The proposed use will not be detrimental to any persons, property, or general welfare. The site is located miles away from any residential or commercial uses.
7. **Proposed ingress and egress, driveway widths, parking, and road improvements shall be approved under applicable Articles of the Zoning Ordinance and the county's Design Standards and Engineering Specifications for Roadways.**
    - ✓ The proposed use will utilize existing roadways.
8. **Adequate buffering devices such as fencing, landscaping, or topographical characteristics shall be in place in order to mitigate and protect adjacent properties from potential adverse impacts of the proposed use, including visual or auditory effects.**
    - ✓ The property is miles are from any property that is not owned by SALT River Project. However, a permanent fence is proposed around the subject site.

9. **Conditional use permits shall comply with the Zoning Ordinance and all applicable local, state, and federal regulations.**
    - ✓ Understood. The proposed site is in compliance with the Zoning Ordinance and all applicable local, state and federal regulations.
10. **A conditional use shall ordinarily comply with the standards of the zone within which the use is located and with the other applicable provisions of the Zoning Ordinance, except as modified by the approval of the conditional use permit and the standards of this Section or as otherwise specified in the Zoning Ordinance.**
    - ✓ Understood.
11. **The Commission may, in addition to the standards and regulations specified in the Zoning Ordinance, establish other conditions found necessary to protect the health, welfare, safety, and interest of surrounding properties, the neighborhood, and the county or community as a whole. These conditions may address the following:**

    a. Increasing the required lot size or yard dimensions;
    b. Limiting the coverage or height of buildings;
    c. Mitigating traffic impacts through on-site and off-site improvements;
    d. Increasing the number of off-street parking and loading requirements;
    e. Limiting the number, location, design, and size of on-site signs and illumination devices;
    f. Increasing required landscaping components to reduce noise and visual impacts including glare;
    g. Specifying time limits for construction and operation;
    h. Requiring performance assurances acceptable to the county attorney;
    i. Specifying time frames for compliance review; and
    j. Other conditions deemed appropriate to address the requirements and intent of this Section, the Zoning Ordinance, and the Apache County Comprehensive Plan.

Impact Statement

a. **Number of employees;**
    - ✓ 2-3 staffed employees during regular operations, with an estimated 100-150 contract employees at peak construction (12-18 month duration), and an estimated 15-25 for annual maintenance work (1-2 week duration).
b. **Estimated amount of traffic by day of week;**
    - ✓ There will be approximately 6 trucks per day during construction. When construction is completed, there will be less than 6 trucks per day.
c. **Parking, storage, loading, and service areas needed;**
    - ✓ Ample parking, storage, and service areas are included on-site within leased area.
d. **Amount of water use and source;**
    - ✓ See “Water and Drainage Report” paragraph below.
e. **Method of handling increased surface drainage;**
    - ✓ See “Water and Drainage Report” paragraph below.
f. **Nearest residences;**

- ✓ The nearest residences are miles from the site.

g. Amount and types of refuse and sewage;

- ✓ Minimal due to the limited amount of employees on site after construction.

h. Any pollutants and method of handling;

- ✓ No air pollutants or emissions are associated with the operation of the project.

i. Site changes necessary including tree removal;

- ✓ The site may be excavated and graded flat subject to results of upcoming geotechnical study. Portions of the site are lightly vegetated and will need to be cleared.

j. Landscaping and recreation provided;

- ✓ None.

k. Use of natural resources;

- ✓ None.

l. Fire prevention and protection systems;

- ✓ Fire prevention and protection will be consistent with the County's requirements.

m. Services required of the county, such as road maintenance and snow removal;

- ✓ None.

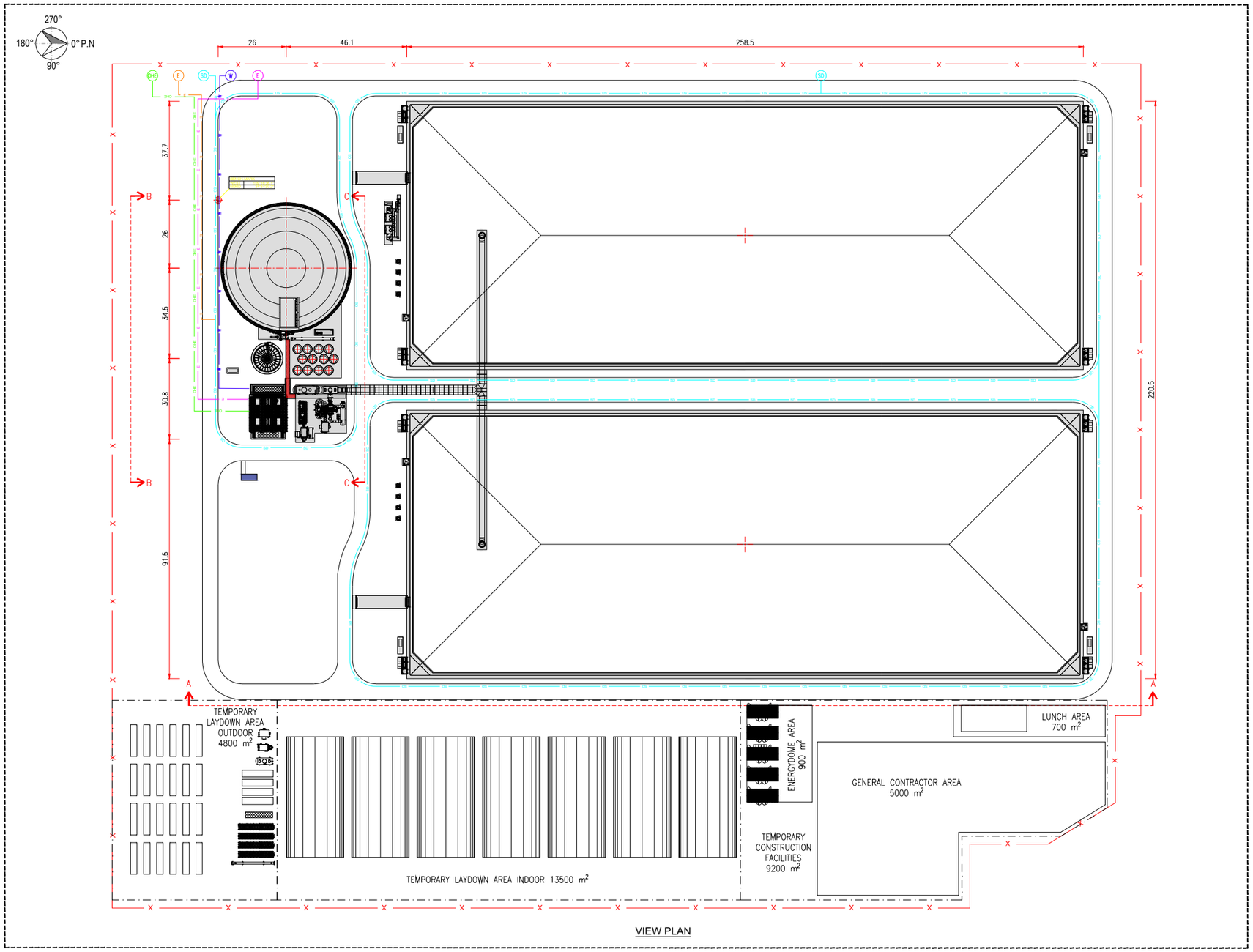
n. Method of controlling dust from traffic areas and other sources.

- ✓ Dust control will be consistent with County's requirements.

Water and Drainage Statement

Operational water use for the project will consist of a one-time initial fill of approximately 7 million gallons for a thermal energy storage tank that is part of the system, supplied from CGS's existing well-fed water system. The system is designed to neither consume nor discharge water from this tank during its operational lifetime, eliminating the need for additional water after the initial fill. The only water discharge will come from a dehumidification system, which will produce approximately 22 gallons per week. This output will be self-contained on-site in either a large tank or a small retention basin. Site grading will ensure that stormwater runoff flows into an existing SRP-owned ditch, which directs water to CGS's wastewater pond for reuse in other plant systems. After maximum reuse, water is then diverted to the evaporation pond, which is the final disposal location in CGS's water management system.

Potable drinking water for operational and construction staff will be delivered by truck to the project site, not provided by any permanent infrastructure.



VIEW PLAN

Position	Description
10	Dome Area
11	Dome
12	External Membrane Air Blowers & Air Dampers
13	Internal Membrane Safety Valve
14	Vehicle Air Lock
15	Revolving Door
16	Dome Emergency Diesel
20	Power Island
21	Precooler HE1100
22	Compressor CO1100
23	Compressor Motor MC1101
24	Intercooler HE1101
25	Compressor Lube Oil LO1101
26	Turbine EX1501
27	Turbine Generator GE1501
28	Post Cooler HE1500
29	Motor Generator Lube oil
30	Packed Bed area
31	PPB PB1211-1224
32	Superheater / Desuperheater HE1301A/B
33	LP Dryer 1801
40	Water Basin area
41	HP Dryer Tank 1910
42	HP Dryer Unit 1930
43	CO2 Pump PC1401
44	CO2 Tank Vapour System
45	Water Basin TA2401
50	TES2 Water Tank
60	Containers area
61	Water Basin Container CT2001
62	CCCW Container CT5001
63	PLC Container CT1004
64	MCC Container CT1003
65	MV Container CT1002
66	Compressor Starter Container CT1001
67	Chiller Unit HE2801
68	Dry Cooler HE5001/5003
91	Main Emergency Diesel

LEGEND:	
Main Benchmark	
Not drivable Surface	
Prefabricated cotrol room	
Permanent Fence	x
Electrical TIE-IN Line	ONE
Drainwater TIE-IN Line	SD
Feedwater TIE-IN Line	W
Station Load TIE-IN Line	E

LEGEND:	
Temporary worksite Electrical connection	E
Electrical TIE-IN Point	(HE)
Drainwater TIE-IN Point	(SD)
Feedwater TIE-IN Point	(W)
Temporary worksite Electrical TIE-IN Point	(E)
Station Load TIE-IN Point	(E)
Contruction phase dedicated Areas	

GENERAL NOTES:

1. All dimensions and elevations are in meters (m).
2. Piping not represented.
3. Main Benchmark 0,0,0
4. Plant zero elevation is xx m above sea level.
5. Civil works Details shall be Client scope.

Revision	Date	Description	Drawn	Checked	Approved
00	14.07.2025	First Issue	R. Crocl	F. Astolfi	S. Penati

ENERGYDOME

CO2 BATTERY PLANT
PLANT GENERAL ARRANGEMENT

Client: SRP

Project: CO2 Battery SRP CGS

Format	Scale	Drawing	Revision	Sheet
A1	1:800	EP159.25.18.180.GAR	00	1 of 3

Client submittal: ☐ For approval ■ For information ☐ For comments ☐ Not requested

0 10 20 30 40 50 m

Exhibit 240-A. Traffic Impact Analysis Pre-Submittal Form

Project Name: SRP Energy Dome

Developer/Owner: Reese Anderson

Phone Number: 480-461-4670

Email: reese.anderson@pewandlake.com

Project Location

State Route (with nearest MP or Street): Coronado Generating Station

Local Jurisdiction: Apache County

Stage of Development (choose one)

☒ Planning/Zoning ☐ Development Plan

Brief Description of Project (land use, intensity, timeframe/phasing)

SRP solicited proposals for a non-inverter based long-duration energy storage pilot facility and selected Energy Dome's 19MW, 10-hr CO_2 Battery project. The project will be located at Coronado Generating Station (CGS), requiring Energy Dome to execute a Ground Lease Agreement with SRP governing the location of the project on the SRP-owned site. The project will occupy approximately 30 acres within CGS and will interconnect to the grid via an existing SRP-owned transformer.

Proposed Access (number, location, restrictions)

There are no proposed access changes to the existing Coronado Generating Station site.

Preliminary Assumptions (provide as attachment)

- Trip Generation
- Study Horizon Years
- Trip Distribution
- Pass-By Or Internal Capture
- Future Roadway Network
- Study Area Intersections

There will be ~6 trucks per day during construction. When construction is completed, there will be less than 6 trucks per day. Trip distribution patterns are anticipated to remain as they are today. The horizon year is 2026. There is no pass-by or internal capture. There are no changes to the existing roadway.

Traffic Study Required (choose one) ☐ Yes ☒ No

Traffic Study Type (choose one if yes, none if no)

☐ Transportation Planning Study
☐ Traffic Impact Analysis
☐ Traffic Impact Statement

Traffic Study Preparer

Firm Name: Lokahi, LLC

Contact: Jamie Ann K. Blakeman, PE, PTOE

Phone: 480-292-0691

Email: jamie@lokahigroup.com

Pre-Submittal Forms are not required for each project but are a useful tool to reduce the number of submittals/reviews and aid development timeframes. When submitted, Regional Traffic Engineering staff will review and confirm the form in a timely manner. Changes to the above information should be provided in writing. A hard copy of an approved Pre-Submittal Form shall be included in the Study appendix.

Approval by: _____ Date: _____

APACHE COUNTY COMMUNITY DEVELOPMENT
P.O. Box 238
75 West Cleveland
St. Johns, Arizona 85936
(928) 337-7526 • Fax (928) 337-7633

Director:
Matthew Fish

Senior Planning
Coordinator
Shaunna Pearce

March 9, 2026,

To: Salt River Project (SRP)

From: Matthew Fish, Community Development Director

RE: Waiver of ADOT Permit Requirement – Conditional Use Permit Application

Dear SRP Representative,

Apache County Community Development has reviewed the Conditional Use Permit (CUP) application currently being submitted by Salt River Project (SRP). Based on our preliminary review of the project, the County is waving the requirement to obtain an Arizona Department of Transportation (ADOT) permit as part of this application.

This waiver is granted because the proposed project is anticipated to generate minimal traffic and will not require the creation of any new access points to the roadway. The project will continue to utilize the same access points that have been in place and functioning for over forty (40) years.

Based on these factors, the County has determined that an ADOT permit is not necessary for the purposes of the Conditional Use Permit review process.

If project conditions change or new access points are proposed in the future, the County may require additional review or coordination with ADOT at that time.

Please include this letter with the CUP application materials for reference.

Sincerely,

Matthew Fish
Community Development Director
Apache County Community Development Department

Katie Hobbs
Governor

ARIZONA
STATE LAND DEPARTMENT

Robyn Sahid
Commissioner

1110 West Washington Street | Phoenix, AZ 85007
(602) 542-4631

February 24, 2026

Attn: Matthew Fish, Director
Apache County Community Development
75 W. Cleveland
PO Box 238
St Johns, AZ 85936

RE: Letter of No Objection Regarding Proposed SRP & Energy Dome Pilot Project Conditional Use Permit Application

Dear Director Fish,

The Arizona State Land Department (ASLD) manages a perpetual land trust consisting of over 9 million acres of State Trust Land (STL) that the United States granted to Arizona upon statehood in the Arizona Enabling Act. The grant is a "solemn promise" by the United States to the State to support the beneficiary purposes set out in the Enabling Act, primarily public education. ASLD has a trust obligation derived from the Enabling Act and Arizona Constitution to manage all those lands for the benefit of the trust's beneficiaries.

This letter is regarding the proposed 19MW long-duration energy storage pilot project (Pilot Project) to be owned and operated by Energy Dome, leasing land from Salt River Project (SRP) in its capacity as an energy off-taker. The Pilot Project would be located in the Southwest Quarter of Section 33, Township 14 North, Range 29 East of the Gila and Salt River Meridian, Apache County, Arizona.

It is our understanding that the applicant is requesting a Conditional Use Permit to allow for the use of a non-inverter-based long-duration energy storage pilot facility on approximately 30 acres within the SRP owned site. ASLD owns and manages [insert applicable number of acres] of STL located within 300 feet of this site. In accordance with Citizen Review Process provisions outlined in ordinance Section 1106, ASLD was notified of the Pilot Project and the applicant's Conditional Use Permit application on December 11, 2025. ASLD met with SRP staff and received a briefing on the Pilot Project on February 3, 2026. Having reviewed the information provided, ASLD has no objections to the Pilot Project proceeding as planned.

Please do not hesitate to reach out should you have any questions. I can be reached in writing at the mailing address listed on the letterhead, via phone at (602) 542-2648 or via email at rojeda@azland.gov.

Respectfully,

Ruben Ojeda
Assistant Director, Real Estate Division

SRP LAND RIGHTS DOCUMENT CODE SHEET

LR Recording Ref Number: 282-215 **LR Recording Date:** 4-3-1978 **Job Number:**

Land Right Doc Code:
☐ Agreement
☐ Consent to Use
☐ Correspondence
☒ Deed
☐ Easement
☐ Grant
☐ Key Map
☐ License
☐ Location Notice
☐ Other
☐ Permit
☐ Quitclaim Deed
☐ Quitclaim Deed – Full Abandonment
☐ Quitclaim Deed – Partial Abandonment
☐ Quitclaim Deed - Easement
☐ Quitclaim Deed - Acquisition
☐ Railroad Crossing
☐ Survey Plat
☐ Title Policy

Easement Type:
☐ Other
☐ Overhead
☐ Overhead/Underground
☐ Underground
☐ Irrigation
☐ Roadway

Geography Span:		
☐ Multi-Section	☐ NW	☒ NE
	☐ SW	☒ SE

Land Right Code:			
☒ SRP	☐ RID	☐ USA	☐ Other

Document Reference #:

☐ Document Error
☐ Questionable Land Right

Comments: WARRANTY DEED DATED 3-7-1978 FOR CLAIR AND LOUISE PLATT PROPERTY

***** FOR SRP USE ONLY *****

ROW#: 434 **Completed By:** DH

Notes: E2, SEC 34, T14N, R29E