

## DOCKETED

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| <b>Docket Number:</b>   | 08-AFC-03C  |
| <b>Project Title:</b>   | Marsh Landing Generating Station Compliance   |
| <b>TN #:</b>            | 203533  |
| <b>Document Title:</b>  | Marsh Landing Generating Station-Petition for Project Modification Approval-Modular Building Installation |
| <b>Description:</b>     | N/A   |
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| <b>Organization:</b>    | California Energy Commission  |
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| <b>Docketed Date:</b>   | 1/16/2015   |

**PETITION FOR APPROVAL OF  
PROJECT MODIFICATIONS  
MARSH LANDING GENERATING  
STATION  
(08-AFC-3C)**

*Submitted to:*

**The California Energy Commission**

*Submitted by:*

**NRG Marsh Landing LLC**

*Prepared by:*

**URS Corporation**

January 2015



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**FIGURES**

Figure 1 Updated General Plot Plan

**APPENDICES**

Appendix A Preliminary Design Sketches  
Appendix B List of Property Owners

**ACRONYMS**

|                   |   |
|-------------------|---|
| AFC               | Application for Certification   |
| ATC               | Authority to Construct  |
| AUSD              | Antioch Unified School District   |
| CEC               | California Energy Commission  |
| MLGS              | Marsh Landing Generating Station  |
| NRG Marsh Landing | NRG Marsh Landing LLC (formerly known as GenOn or Mirant Marsh Landing LLC) |
| URS               | URS Corporation   |

## 1.0 INTRODUCTION

In accordance with Title 20 California Code of Regulations Section 1769 (Section 1769), NRG Marsh Landing LLC (formerly known as GenOn or Mirant Marsh Landing LLC) (NRG Marsh Landing) submits this petition for approval of post-certification modifications to the Marsh Landing Generating Station project (MLGS or project) license. In August 2010, the California Energy Commission (CEC) issued the Commission Decision approving the MLGS, adopted in Order No. 10-0825-03 in Docket 08-AFC-3C (Commission Decision). The Bay Area Air Quality Management District issued the Authority to Construct (ATC) for the MLGS in August 2010. As approved in the Commission Decision and the ATC, the MLGS is a nominal 760-megawatt electricity-generating facility, consisting of four simple-cycle natural-gas-fired combustion turbines.

In 2012, a petition was submitted to cover certain refinements to the design of the project's fuel gas preheater system, water supply and treatment processes, and other project components (URS, 2012; CEC, 2012a). CEC approved the petition to incorporate the design refinements on May 1, 2012 (CEC, 2012b).

On May 1, 2013, MLGS commenced commercial operations.

On July 8, 2014, NRG Marsh Landing submitted a Petition to Amend to address the proposed installation of a new diesel backup generator and a diesel fire pump engine. On November 17, 2014, CEC approved the petition, which included new and modified conditions of certification related to Air Quality and Biology (CEC, 2014).

NRG Marsh Landing has now identified the need to install a modular building that will provide additional storage space for project documents, and room for a simulator to be used for plant staff training. This new building is within the 27-acre project site, and is located in an area that was already disturbed and monitored during the original grading and construction of MLGS; it does not result in any additional disturbed areas beyond the site that were not previously evaluated in the record supporting adoption of the Commission Decision. This petition describes the project modifications, and analyzes whether they result in any environmental consequences not previously analyzed. *As set forth below, the project modifications do not materially change the environmental consequences of the MLGS; they do not necessitate any changes to any of the conditions of certification in the Commission Decision (CEC, 2010b); and their impacts are expected to remain less than significant.*

As stated above, this petition is submitted in accordance with Section 1769. Section 1769 specifies that after the final decision approving a project is effective, the applicant must file with the CEC a petition for any modifications it proposes to the project design, operation, or performance requirements. Section 1769 specifies that the petition must contain the following information:

- (A) *A complete description of the proposed modifications, including new language for any conditions that will be affected.*

Section 2.0 below provides a complete description of the project modifications. No conditions of certification will be affected by the modification, and no new conditions of certification are required.

- (B) *A discussion of the necessity for the proposed modifications.*

The project modifications are necessary due to space limitations at the existing Administration Building; additional space is needed to store plant documents. The plant also needs to install simulator equipment to be used to train operators.

- (C) *If the modification is based on information that was known by the petitioner during the certification proceeding, an explanation of why the issue was not raised at that time.*

The project modifications are based on project needs identified after the Commission Decision was issued.

- (D) *If the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, an explanation of why the change should be permitted.*

The project modifications do not materially change or undermine the assumptions, rationale, findings, or other bases of the Commission Decision.

- (E) *An analysis of the impacts the modification may have on the environment, and proposed measures to mitigate any significant adverse impacts.*

The project modifications will not have any adverse impacts on the environment, and no measures beyond those already included in the existing conditions of certification are required.

- (F) *A discussion of the impact of the modifications on the facility's ability to comply with applicable laws, ordinances, regulations, and standards.*

The project modifications will not affect the project's ability to comply with applicable laws, ordinances, regulations, and standards.

- (G) *A discussion of how the modification affects the public.*

The project modifications will not have any material adverse effect on the public.

- (H) *A list of property owners potentially affected by the modification.*

The project modifications will not have any material adverse effect on any property owners. The list of property owners within 1,000 feet of the project is provided in Appendix B.

- (I) *A discussion of the modifications' potential effect on nearby property owners, the public, and the parties in the application proceedings.*

The project modifications will not have a material adverse effect on nearby property owners, the public, or the parties to the application proceeding.

Based on the information and analysis provided in support of this petition, we believe that staff can determine that: (1) there is no possibility that the project modifications will have a significant effect on the environment; (2) the project modifications will not necessitate a change or deletion of a condition imposed by the CEC in the Commission Decision; and (3) the project modifications will not make changes that would cause the project not to comply with any applicable laws, ordinances, regulations, or standards. Therefore, pursuant to Section 1769, Commission approval is not required for the project modifications.

## 2.0 PROJECT MODIFICATIONS

Modifications to the project include a new modular-type building that will provide space for project documents and an operator training computer simulator. The new building will be located near the existing Administration Building, as shown on Figure 1.

NRG Marsh Landing proposes to install a 12-foot by 42-foot modular building on an engineered and seismically designed foundation. The new building will be approximately 504 square feet in area, and 12 feet 9 inches tall. The building will be placed on an engineered pier system, supported by the existing asphalt at grade level. The preliminary design sketches included in Appendix A indicate the building location, access platforms, and utilities.

Minimal building utilities are required for the building installation, because it will be adjacent to the existing Administration Building. The required utilities are a 125-amp power service, a small conduit for telecommunications, and grounding for the building to the existing grounding grid directly underneath the proposed building location. The proposed trenching for these services is indicated on the sketches provided in Appendix A. Because bathrooms and a kitchen are already provided at the Administration Building, these facilities will not be included in the new building; therefore, service water piping to the new building is not required. The required fire protection will consist of several wall hanging fire extinguishers; therefore, trenching for an installation into the existing fire water system is not required.

The exterior and interior finishes of the new modular building will be very similar to the existing Administration Building, and will match the existing characteristics of the plant site. Americans with Disabilities Act-compliant access ramps and platforms will be provided, as shown on the sketches included in Appendix A. The access ramps will be structurally engineered, permanent, and of a quality commensurate with the aesthetics of the existing building access ways.

The new building will be placed on an existing asphalt-covered area. The only excavation required will be for utility line trenches from the existing Administration Building to the new building, approximately 20 feet away. Trenches will be approximately 2 to 3 feet deep and 6 inches wide. During trenching, ramps will be installed if the trenches are left open overnight. Trenching will go through areas that are covered in either asphalt or gravel.

As explained further below, the proposed modifications do not result in any changes to the environmental consequences of the MLGS. Furthermore, all impacts are expected to remain less than significant with implementation of conditions of certification set forth in the Commission Decision (CEC, 2010b) and subsequent amendments.

### 2.1 AIR QUALITY

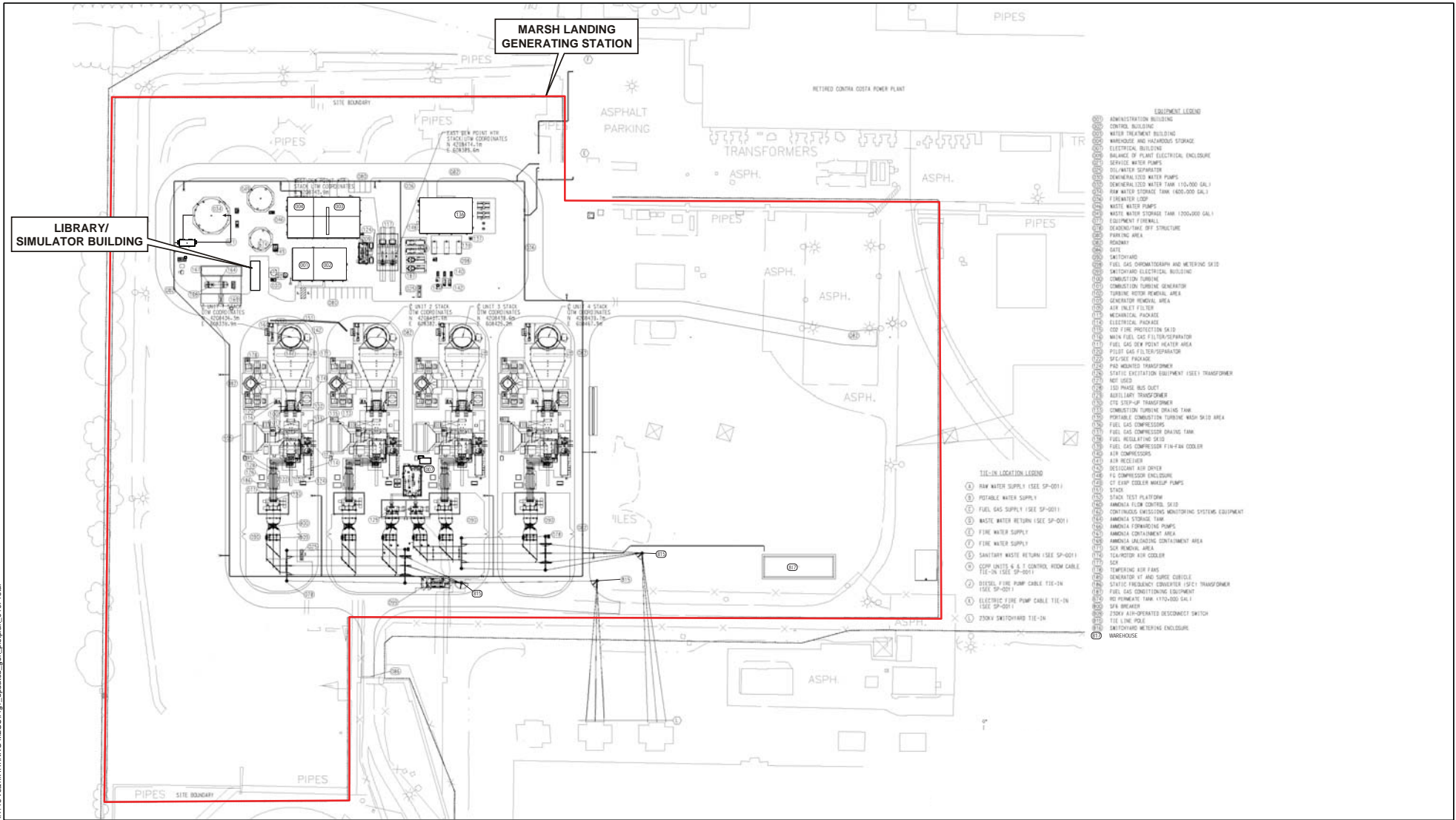
NRG Marsh Landing is proposing to install a new modular building. There are no grading activities associated with the installation. There will be minimal trenching for installation of utilities.

Therefore, the project modifications would not change the analysis of potential impacts to air quality use described in Application for Certification (AFC) Section 7.1 (URS, 2008), the AFC Amendment (URS, 2009), and the Commission Decision (CEC, 2010b). Impacts to air quality are expected to be less than significant with implementation of conditions of certification.

### 2.2 BIOLOGICAL RESOURCES

As described in AFC Section 7.2 (URS, 2008), the AFC Amendment (URS, 2009), and the Commission Decision (CEC, 2010b), no threatened or endangered plant or wildlife species have been observed during





Source:  
 Kiewit; Genon Marsh Landing LLC, Marsh Landing Generating Station;  
 Plot Plan; Drawing No. 2009-019-PP-001 (Rev. B, 06-16-11; Rev E, 04-09-13)  
 Preliminary - Not for Construction

**UPDATED GENERAL PLOT PLAN**

Marsh Landing Generating Station  
 NRG Marsh Landing, LLC  
 Contra Costa County, California

January 2015  
 28068359



FIGURE 1



17/15/vashk...T\NRG MLGSP\pl...updated\_gen\_plotplan\_010715.dwg

biological resource field surveys of the project site. The project modifications are within the 27-acre project site, and would not result in any additional disturbed areas beyond the site. The new building will be installed in an area currently covered in asphalt. Trenching will be minimal (approximately 20 feet in length between the existing Administration Building and the new building). The trench will go through areas currently covered in either asphalt or gravel.

The construction activities associated with the proposed modifications, including laydown and staging areas, will not take place near any biologically sensitive area. The new building will be installed in the interior portion of the site, west of the Administration Building and near the ammonia tank. The new building will be more than 250 feet south of the MLGS' northern property line, and more than 240 feet east of the trees along the MLGS' western property line.

Therefore, the project modifications would not change the analysis of potential impacts to biological resources previously analyzed by CEC Staff in Section 4.2 of the Revised Staff Assessment (CEC, 2010a), and reviewed and approved by the Commission in Section VI, A of the Commission Decision (CEC, 2010b). Impacts to biological resources are expected to be less than significant with implementation of the conditions of certification adopted in the Commission Decision. Therefore, the project modifications do not require any changes to the conditions of certification to address potential impacts in the area of biological resources.

## **2.3 CULTURAL RESOURCES**

The project modifications are within the 27-acre project site, and would not result in any additional disturbed areas beyond the site. Ground disturbance activities associated with the construction of the new building will be minimal, and will be in previously disturbed areas of the MLGS project site. The building and utility trench are located in an area that was previously disturbed and monitored during the original grading and construction of MLGS. As discussed in AFC Section 7.3 (URS, 2008) and set forth in the Commission Decision (CEC, 2010b), no significant archaeological or historic and architectural (built environmental) resources were identified in the project site or vicinity. Therefore, the project modifications would not change the analysis of potential impacts to cultural resources described in AFC Section 7.3, the AFC Amendment (URS, 2009), and the Commission Decision. Impacts to cultural resources are expected to be less than significant with implementation of the conditions of certification adopted in the Commission Decision (CEC, 2010b).

## **2.4 LAND USE**

The project modifications are within the 27-acre project site, and do not alter the analysis of potential impacts to land use resources presented in AFC Section 7.4 (URS, 2008) and set forth in the Commission Decision (CEC, 2010b). That analysis found that the project would not disrupt or divide an established community; would not conflict with the established uses of the area; would be consistent with existing zoning and applicable land use plans, policies, and regulations; and would not affect farmlands. Therefore, the project modifications would not change the analysis of potential impacts to land use described in AFC Section 7.4, the AFC Amendment (URS, 2009), and the Commission Decision. Impacts to land use are expected to be less than significant with implementation of conditions of certification.

## **2.5 NOISE**

The project modification consists of installing a new building that would have no operational noise impacts. Therefore, there would be no significant changes to the potential noise emissions during operations that were modeled and presented in the AFC Amendment (URS, 2008). Operational noise impacts are expected to be less than significant with implementation of the noise conditions of certification adopted in the Commission Decision (CEC, 2010b).

## 2.6 PUBLIC HEALTH

The project modifications, which consist of installing a new building, would have no impacts on public health. The very short duration of the installation is not expected to result in significant long-term public health effects. The modifications do not increase operational emissions of toxic air contaminants. Therefore, the project modifications would not change the analysis of potential impacts to public health described in the AFC Amendment (URS, 2008) and the Commission Decision (CEC, 2010b). Impacts to public health are expected to be less than significant with implementation of conditions of certification.

## 2.7 WORKER SAFETY AND FIRE PROTECTION

The project modifications are within the 27-acre project site, and would not change the anticipated workplace hazards or require changes to the safety programs presented in the AFC (URS, 2008) and the AFC Amendment (URS, 2009), and set forth in the Commission Decision (CEC, 2010b). The new building will have fire extinguishers for fire protection. The project will continue to comply with the Fire Prevention Plan in accordance with condition of certification WORKER SAFETY-2.

Potential impacts to worker safety and health are expected to be less than significant with implementation of conditions of certification.

## 2.8 SOCIOECONOMICS

The project modifications consist of adding a new building (approximately 504 square feet). The estimated additional square footage of covered and enclosed space at MLGS due to the project modifications addressed in this petition is 504 square feet, or an increase of approximately 2 percent (above the combined total of 23,164.5 square feet presented in two previous petitions [22,347.5 square feet in the January 2012 Petition for Approval of Project Modifications and 817 square feet in the July 2014 Petition to Amend]).

The Antioch Unified School District (AUSD) has a school development impact fee that is based on the square footage of covered and enclosed space. In accordance with condition of certification SOCIO-1, the project owner shall pay the one-time statutory school development fee to the AUSD, as required by Education Code Section 17620. Accordingly, to cover this additional footprint of the buildings/enclosures, NRG Marsh Landing made an additional payment of \$272 to AUSD as part of the building/enclosure modifications (504 square feet at \$0.54 per square foot = \$272). This payment was made on January 13, 2015.

The project modifications are within the 27-acre project site, and would not alter the analysis of potential socioeconomic impacts presented in the 2009 AFC Amendment (URS, 2009) and in the Commission Decision (CEC, 2010b). The analysis concluded that the proposed project would not induce substantial growth or concentration of population; induce substantial increases in demand for public service and utilities; displace a large number of people; disrupt or divide an established community; or result in disproportionate adverse effects on minority or low-income populations. Potential socioeconomic impacts are expected to be less than significant with implementation of the conditions of certification adopted in the Commission Decision.

## 2.9 SOILS

There will be minimal ground disturbance during installation of the new building. The building site is currently covered in either asphalt or gravel. No grading of the site is required. Trenching for the installation of utilities will be approximately 20 feet long, 2 to 3 feet deep, and 6 inches wide. The project modifications are within the 27-acre project site, would not result in increased soil erosion or loss of topsoil, and would not alter the analysis of potential impacts to soils described in the AFC (URS, 2008)

and the AFC Amendment (URS, 2009), and set forth in the Commission Decision (CEC, 2010b). Therefore, potential impacts to soil resources are expected to be less than significant with implementation of the conditions of certification adopted in the Commission Decision.

## **2.10 TRAFFIC AND TRANSPORTATION**

The project modifications are within the 27-acre project site, and would not alter the analysis of potential traffic and transportation impacts presented in the AFC (URS, 2008), the AFC Amendment (URS, 2009), and the Commission Decision (CEC, 2010b)—including roadway and intersection levels of service during project operation, and potential impacts to transportation networks. Therefore, potential traffic and transportation impacts are expected to be less than significant with implementation of the conditions of certification adopted in the Commission Decision.

## **2.11 VISUAL RESOURCES**

The project modifications include the addition of a new modular-type building, shown in Appendix A. The new building will be located near the existing Administration Building, and will have similar exterior treatments. The building will be approximately 12 feet 9 inches tall, which is lower than the Administration Building. These changes will be visually imperceptible when the project is viewed as a whole. This is because the largest features associated with the project (e.g., exhaust stacks and combustion turbine generators) will not be altered as a result of these refinements. Furthermore, the new building would not visually dominate the site, nor would it create a visual point of interest due to its size in relation to the other plant facilities. Therefore, these changes will not modify the existing analysis or conclusions presented in Section 7.11 of the AFC (URS, 2008) or the AFC Amendment (URS, 2009). Therefore, potential visual impacts at all seven key observation points are expected to remain less than significant with implementation of the conditions of certification adopted in the Commission Decision (CEC, 2010b).

## **2.12 HAZARDOUS MATERIALS**

There are no changes to the hazardous materials that would be used during operation of the MLGS due to the addition of the new building. Therefore, as described in AFC Section 7.12 (URS, 2008) and the AFC Amendment (URS, 2009), and set forth in the Commission Decision (CEC, 2010b), potential hazardous materials handling impacts are expected to be less than significant with implementation of the conditions of certification adopted in the Commission Decision.

## **2.13 WASTE MANAGEMENT**

The project modifications are within the 27-acre project site, and there would be no increases in the types, quantities, or frequencies of wastes generated by the project during construction or operation of the MLGS. AFC Section 7.13 (URS, 2008), the AFC Amendment (URS, 2009), and the Commission Decision (CEC, 2010b) include best management practices that will be implemented during operation of the MLGS to manage and minimize the amount of waste generated. Therefore, potential waste management impacts are expected to be less than significant with implementation of the conditions of certification adopted in the Commission Decision.

## **2.14 WATER RESOURCES**

There will be no change in the project's annual use of water. There are no sanitary or kitchen facilities in the new building.

The project modifications would not result in changes to the analysis of water resources, water quality, or flood hazards described in AFC Section 7.14 (URS, 2008), the AFC Amendment (URS, 2009), Section 4.9 of the Revised Staff Assessment (CEC, 2010a), and the Commission Decision (CEC, 2010b).

Impacts to water resources are expected to be less than significant with implementation of the conditions of certification adopted in the Commission Decision. No changes to the conditions of certification are needed to reflect the project modifications.

## **2.15 GEOLOGIC HAZARDS AND RESOURCES**

The project modifications are within the 27-acre project site; they would not result in changes to the analysis of geologic hazards, or in significant adverse impacts to the geologic environment. The modular building will be installed on an engineered and seismically designed foundation. Therefore, as described in AFC Section 7.15 (URS, 2008) and the AFC Amendment (URS, 2009), and set forth in the Commission Decision (CEC, 2010b), impacts to geologic hazards and resources are expected to be less than significant with implementation of the conditions of certification adopted in the Commission Decision.

## **2.16 PALEONTOLOGICAL RESOURCES**

The project modifications are within the 27-acre project site, and would not result in any additional disturbed areas beyond the site. Ground-disturbing activities associated with the construction of the new building will be minimal, and will be in previously disturbed areas of the MLGS project site. Therefore, these modifications would not change the analysis of impacts to paleontological resources described in AFC Section 7.16 (URS, 2008) and the AFC Amendment (URS, 2009), and set forth in the Commission Decision (CEC, 2010b). Impacts to paleontological resources are expected to be less than significant with implementation of the conditions of certification adopted in the Commission Decision.

## **3.0 REFERENCES**

- CEC (California Energy Commission), 2010a. Revised Staff Assessment, Marsh Landing Generating Station. June.
- CEC (California Energy Commission), 2010b. Commission Decision, Marsh Landing Generating Station. August.
- CEC (California Energy Commission), 2012a. Marsh Landing Generating Station, Staff Analysis of Proposed Modifications for Project Design Refinements. Docket Number 64111. March.
- CEC (California Energy Commission), 2012b. Notice of Decision, Marsh Landing Generating Station. Docket Number 65074. May 1.
- CEC (California Energy Commission), 2012c. Order Approving a Petition to Incorporate Design Refinements Docket Number 65221. May 15.
- CEC (California Energy Commission), 2012d. Order Approving a Petition to Modify Condition of Certification BIO-8 Docket Number 68754. December 3.
- CEC (California Energy Commission), 2014. Order No. 14-1117-8 – Approving Modifications to Air Quality and Biological Resources Conditions of Certification. Docket Number 203440. November 17.
- URS (URS Corporation), 2008. Application for Certification. Marsh Landing Generating Station. May.
- URS (URS Corporation), 2009. Application for Certification Amendment. Marsh Landing Generating Station. September.
- URS (URS Corporation), 2012. Petition for Approval of Project Design Refinements. Docket Number TN 63551. January.

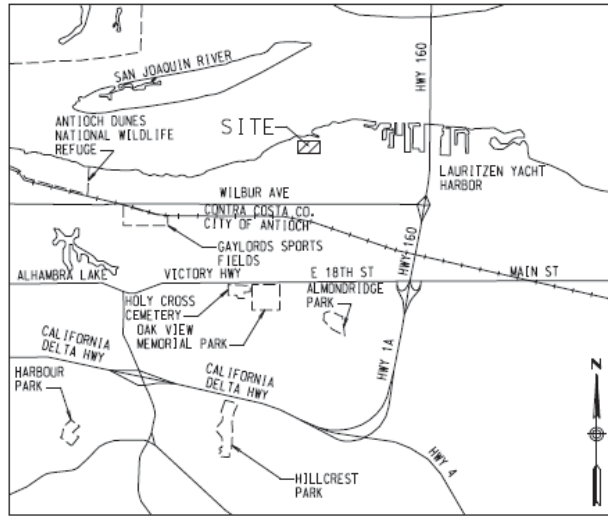
**APPENDIX A**  
**PRELIMINARY DESIGN SKETCHES**



# MARSH LANDING GENERATING STATION ANTIOCH, CALIFORNIA



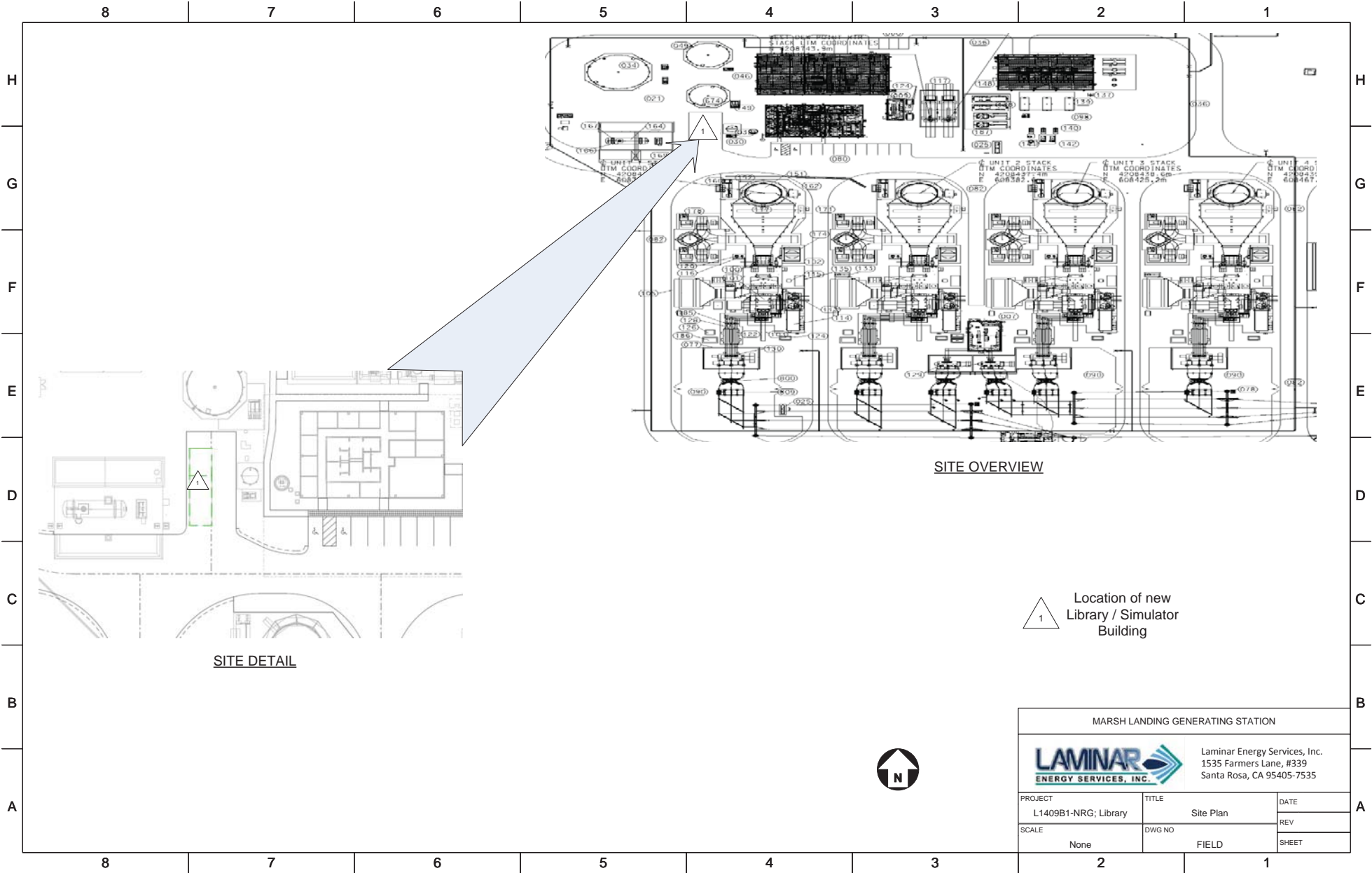
LOCATION MAP  
NTS



VICINITY MAP  
NTS

|   |               |   |
|---|---------------|---|
| MARSH LANDING GENERATING STATION  |               |   |
|  |               | Laminar Energy Services, Inc.<br>1535 Farmers Lane, #339<br>Santa Rosa, CA 95405-7535 |
| PROJECT   | TITLE         | DATE  |
| L1409B1-NRG; Library  | Location Plan | REV   |
| SCALE   | DWG NO        | SHEET   |
| None  |               |   |





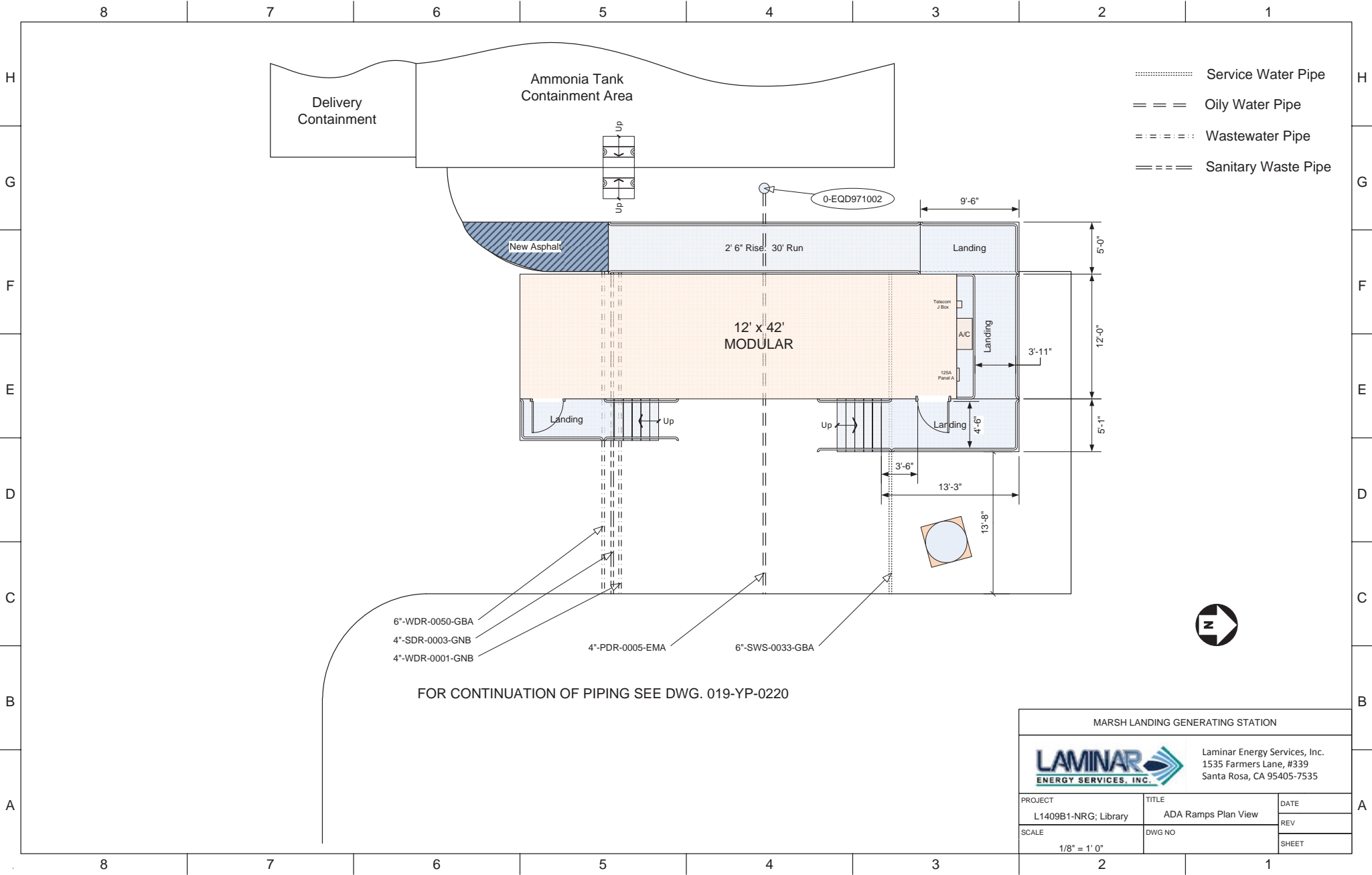
SITE OVERVIEW

SITE DETAIL

△  
1 Location of new Library / Simulator Building



| MARSH LANDING GENERATING STATION  |                      |   |           |
|---|----------------------|---|-----------|
|  |                      | Laminar Energy Services, Inc.<br>1535 Farmers Lane, #339<br>Santa Rosa, CA 95405-7535 |           |
| PROJECT   | L1409B1-NRG; Library | TITLE   | Site Plan |
| SCALE   | None                 | DWG NO  | FIELD     |
|   |                      | DATE  | REV       |
|   |                      |   | SHEET     |




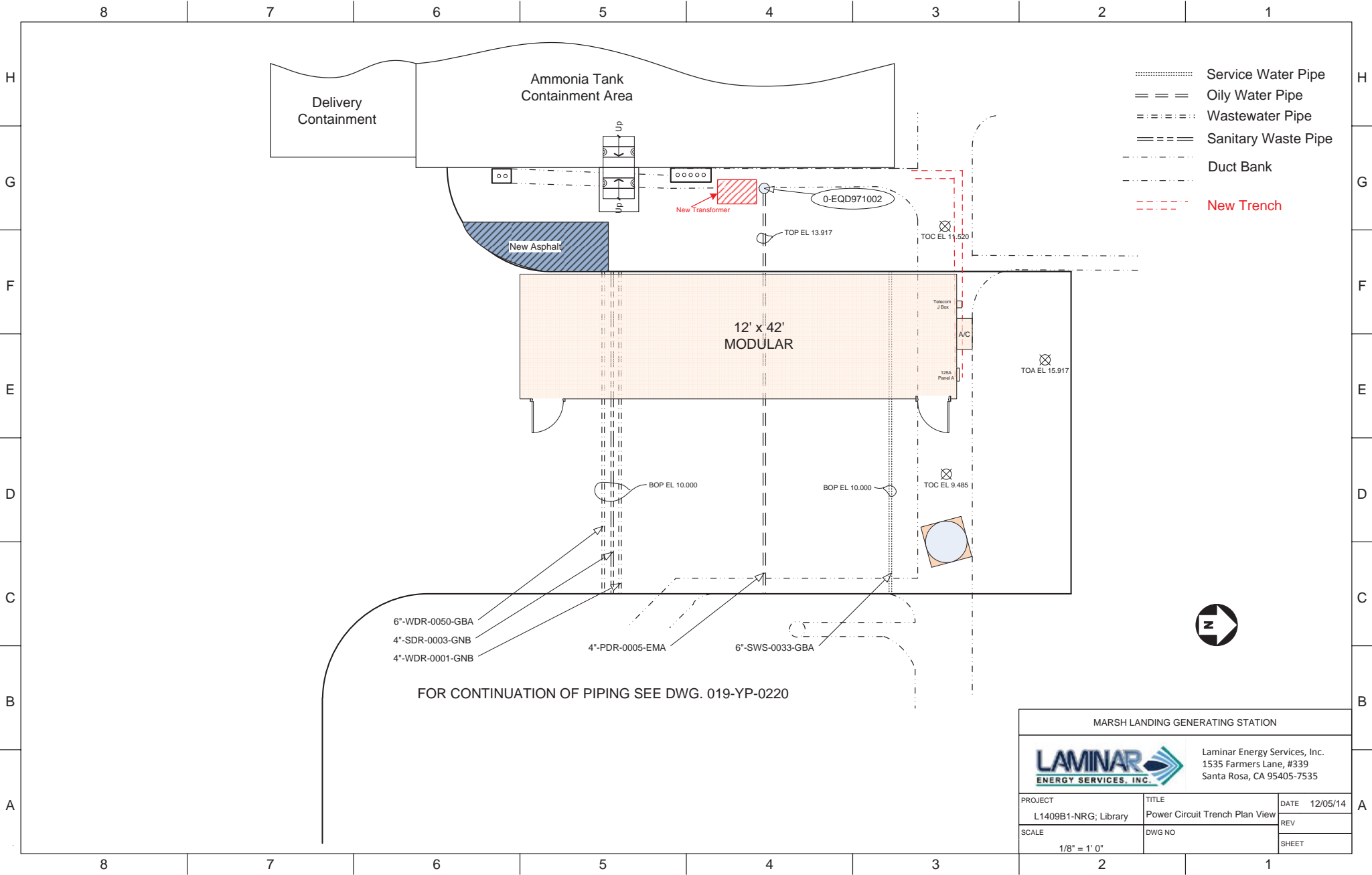
- ..... Service Water Pipe
- ==== Oily Water Pipe
- . - . - . Wastewater Pipe
- ===== Sanitary Waste Pipe



6"-WDR-0050-GBA  
 4"-SDR-0003-GNB  
 4"-WDR-0001-GNB  
 4"-PDR-0005-EMA  
 6"-SWS-0033-GBA

FOR CONTINUATION OF PIPING SEE DWG. 019-YP-0220

|   |                     |   |
|---|---------------------|---|
| MARSH LANDING GENERATING STATION  |                     |   |
|  |                     | Laminar Energy Services, Inc.<br>1535 Farmers Lane, #339<br>Santa Rosa, CA 95405-7535 |
| PROJECT   | TITLE               | DATE  |
| L1409B1-NRG; Library  | ADA Ramps Plan View | REV   |
| SCALE   | DWG NO              | SHEET   |
| 1/8" = 1' 0"  |                     |   |



- Service Water Pipe
- Oily Water Pipe
- Wastewater Pipe
- Sanitary Waste Pipe
- Duct Bank
- New Trench

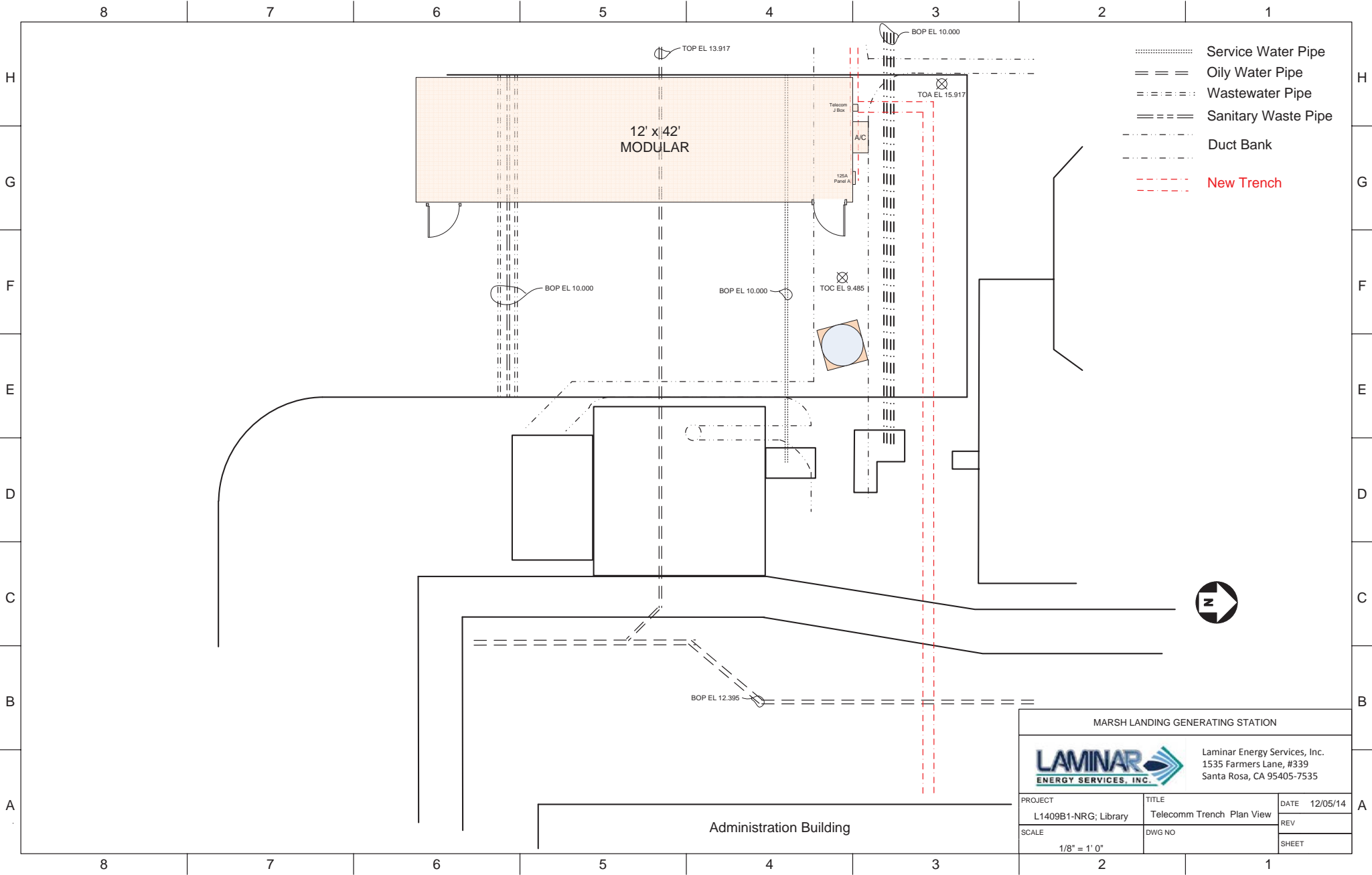
6"-WDR-0050-GBA  
 4"-SDR-0003-GNB  
 4"-WDR-0001-GNB







4"-PDR-0005-EMA


6"-SWS-0033-GBA

FOR CONTINUATION OF PIPING SEE DWG. 019-YP-0220

|                                  |                                |   |
|----------------------------------|--------------------------------|---|
| MARSH LANDING GENERATING STATION |                                |   |
|                                  |                                | Laminar Energy Services, Inc.<br>1535 Farmers Lane, #339<br>Santa Rosa, CA 95405-7535 |
| PROJECT                          | TITLE                          | DATE  |
| L1409B1-NRG; Library             | Power Circuit Trench Plan View | 12/05/14  |
| SCALE                            | DWG NO                         | REV   |
| 1/8" = 1' 0"                     |                                |   |
|                                  |                                | SHEET   |



-  Service Water Pipe
-  Oily Water Pipe
-  Wastewater Pipe
-  Sanitary Waste Pipe
-  Duct Bank
-  New Trench

|   |                           |   |
|---|---------------------------|---|
| MARSH LANDING GENERATING STATION  |                           |   |
|  |                           | Laminar Energy Services, Inc.<br>1535 Farmers Lane, #339<br>Santa Rosa, CA 95405-7535 |
| PROJECT   | TITLE                     | DATE  |
| L1409B1-NRG; Library  | Telecomm Trench Plan View | 12/05/14  |
| SCALE   | DWG NO                    | REV   |
| 1/8" = 1' 0"  |                           |   |
|   |                           | SHEET   |



**APPENDIX B**  
**LIST OF PROPERTY OWNERS**



051 031 015  
PACIFIC GAS & ELECTRIC COMPANY  
PO BOX 770000  
SAN FRANCISCO, CA 94177-0001

051 031 016  
PACIFIC GAS & ELECTRIC COMPANY  
5555 FLORIN PERKINS RD  
SACRAMENTO, CA 95826

051 031 017  
NRG DELTA LLC  
1350 TREAT BLVD #500  
WALNUT CREEK, CA 94597

051 031 020  
NRG DELTA LLC  
1350 TREAT BLVD #500  
WALNUT CREEK, CA 94597

051 031 021  
NRG DELTA LLC  
1350 TREAT BLVD #500  
WALNUT CREEK, CA 94597

051 031 005  
FORESTAR (USA) REAL ESTATE COMPANY  
Bee Cave Rd, BLDG 2-500  
AUSTIN, TX 78746-5833



