TOMBSTONE RESOURCES L.L.C.
600 Peachtree Street NE, Suite 5200 · Atlanta, Georgia 30308

October 30, 2026

Cochise County Development Services
Attn: Christine McLachlan, AICP, Director
1415 W. Melody Lane, Building F
Bisbee, Arizona 85603

Re: Special Use Authorization Application — Data Center (Supercomputer Campus)
Approximately 747 acres on two properties, RU-4 zoning, U.S. Highway 191, Cochise, unincorporated Cochise County
31 Assessor parcels (see Appendix C); Property owners: Arizona Electric Power Cooperative, Inc. (approx. 400 acres) and Southline Transmission (approx. 348 acres)
Applicant: Tombstone Resources L.L.C.

Director McLachlan:

Tombstone Resources L.L.C. submits this application for a Special Use Authorization under Zoning Regulations Section 2.51.040 (Ordinance 26-09) to develop a data center campus on approximately 747 acres of Rural (RU-4) land on two properties along U.S. Highway 191, each adjoining Arizona Electric Power Cooperative's Apache Generating Station lands: approximately 400 acres owned by Arizona Electric Power Cooperative, Inc. (AEPCO) and approximately 348 acres owned by Southline Transmission. The applicant is under contract to purchase the AEPCO property and is under agreement with Southline Transmission for the Southline Transmission property, and files as both owners' authorized agent. One Special Use Authorization is requested for the campus as a whole. The campus is planned in four phases to up to nine computing buildings, with their associated electrical buildings, cooling yards, battery yards and support structures, with a total electric demand of approximately 6 gigawatts (6,000 megawatts): five buildings on the AEPCO property and four on the Southline Transmission property, both shown on the concept plan in Appendix D. The applicant is also pursuing parcels north of the AEPCO property; if they come under the applicant's control, the applicant expects to seek an amendment to add them to the campus.

Project at a glance:

- Site: approximately 747 acres on two properties east of U.S. Highway 191 at Cochise (about 400 acres owned by AEPCO and 348 acres owned by Southline Transmission), zoned RU-4.
- Buildings: up to nine single-story computing buildings of about 493,000 square feet each (about 1,900 by 260 feet, 38 feet 8 inches tall), with their electrical buildings, cooling and battery yards, and an operations building.
- Power: approximately 6 gigawatts at full build-out in four phases, all delivered from the grid through SSVEC and AEPCO; natural-gas standby generators for critical services only; battery storage for ride-through.
- Water: dry-cooled, no cooling towers; about 7 to 10 acre-feet per year at full build-out, most of it domestic use by the operating staff (the use of 20 to 30 Arizona homes); no new groundwater well; no groundwater for industrial use.
- People: construction workforce in the thousands while a phase is built, on the order of 5,500 at peak, working around the clock and moved largely by a worker shuttle from off-site park-and-ride lots; roughly 250 operations, security and maintenance staff, including on-site contractors, when the first buildings open, and a permanent workforce on the order of 1,000 at full build-out.
- Grid investment: on the order of $3.6 billion of applicant-funded transmission and substation improvements in Cochise County, paid through the three-party electric energy services agreement with SSVEC and AEPCO.
- Requests: height to 40 feet, site coverage to 50 percent, and 24-hour construction.

The project has been designed to the standards of Section 2.51.040 and to the items discussed at the October 13, 2026 pre-application meeting:

- Power is delivered from the grid through Sulphur Springs Valley Electric Cooperative and AEPCO to a utility-owned substation on the site. Standby generation is limited to approximately 10 megawatts of natural-gas-fired generators per building for critical loads, supplied by pipeline natural gas. Written utility availability information from the electric providers, with the projected demand, is included as Appendix J.
- The campus is dry-cooled. It uses no cooling towers and no evaporative spray in normal operation (any reserve spray capability is projected to run only a few hours a year), so total operational water use at full build-out is about 7 to 10 acre-feet per year, most of it domestic use by the operating staff, roughly the use of 20 to 30 Arizona homes. No new Willcox AMA production well is proposed; non-potable needs, including the one-time fill of the closed cooling loops, are planned from the

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adjoining station's treated wastewater or trucked water, without new pumping from the Willcox basin aquifer.

- Battery energy storage provides ride-through on loss of utility power. The battery containers are listed units whose detection, gas monitoring, thermal management and electrical isolation are built into the product, and their battery-management signals are monitored around the clock by the on-site controls team. Fire protection for the battery yards is private hydrants, spaced per the product listing and its large-scale fire testing, for exposure protection of the surroundings; no fixed suppression system is proposed on the containers, consistent with the listing and with industry guidance for lithium-ion storage. A battery decommissioning plan will be provided.
- The site is outside any fire district. Fire protection is provided on site: a dedicated fire-water tank with redundant fire pumps feeding a private hydrant loop; wet-pipe sprinklers and a voice and strobe fire alarm in the core and shell of each computing building; clean-agent gas suppression with pre-action sprinklers, ceiling and underfloor spot detection and aspirating smoke detection above each rack row in every computing hall, with hand-held clean-agent extinguishers throughout; and pre-action sprinklers with detection in the electrical buildings. A response agreement will be sought with the nearest district; if an agreement is made with a district the applicant will pay that district's assessments, is prepared to partner with a district that wishes to serve the site on terms set in the Development Agreement, and otherwise will maintain trained on-site emergency response as the applicant's affiliates do at their other facilities.
- Buildings and equipment are set back well beyond the Rural minimums (100 feet from property lines; 150 to 300 feet from existing dwellings), equipment yards are placed toward the interior of the campus, site lighting during operations is minimized, with fixtures off or dimmed except where work or security requires and dark-sky compliant where on, and stormwater will meet the County Floodplain Regulations and Stormwater Ordinance.
- The property lies near the Willcox Playa, a recognized wintering area for sandhill cranes and an Important Bird Area within the Sky Islands region, and the campus has been designed with that setting in mind: dry cooling with no cooling towers, ornamental ponds or open process water; low metal buildings with minimal, bird-safe glazing; fully shielded, warm-spectrum, downward-directed lighting with motion control and no uplighting; bird flight diverters on any new applicant-controlled overhead line within the campus; stormwater basins that drain within 24 hours and have wildlife escape ramps; and wildlife-friendly fencing with a visible top rail and no barbed wire, with security fencing at the building and equipment pads and along those sections of the property line where security requires it, so that wildlife movement across the rest of the property continues. The design will be shared with the Arizona Game and Fish Department and the U.S. Fish and Wildlife Service, a biological and special-status species assessment will be completed before ground disturbance, and pre-construction environmental baselines will be established and monitored through construction, with any operational monitoring defined in the Development Agreement. Section 14 of the Operations Narrative (Appendix E) sets out these commitments.
- The computing buildings are 38 feet 8 inches tall. The applicant requests that the Special Use Authorization modify the 30-foot Rural height limit under Section 2.51.040.5.a to allow computing buildings and outdoor mechanical equipment, including the dry coolers and tanks, up to 40 feet. The substation is utility-owned and exempt. The applicant's electrical equipment is below 30 feet; the dry coolers stand about 38 feet, which is why the request covers them. Because the dry-cooler yards and other outdoor equipment bring site coverage to about 42 to 43 percent against the 25 percent Rural standard (measured by use on the AEPCO property under the zoning regulations' definition, which counts structures, buildings and paving and excludes gravel and landscaping; the Southline Transmission property is laid out to the same building-and-yard pattern and is expected to be about 40 percent), the applicant also requests a site-coverage modification (or concurrent variance, as the County directs) and commits to all applicable County drainage criteria for the added coverage. If the additional land to the north is secured, the same buildings and yards would be measured against a larger site and overall coverage would fall. The applicant also requests authorization for 24-hour construction, including construction lighting, for the duration of each construction phase, which exceeds the lighting code's temporary construction allowance. The three requests are set out in Appendix I. Building locations, sizes and equipment layouts on the concept plan are conceptual; adjustments that remain within the approved setbacks, height and coverage limits will be handled at building permit.
- The project brings economic benefit to the County without drawing on County services. Construction is a multi-year program employing thousands of trades workers, on the order of 5,500 at peak, including civil and site-work crews, heavy-equipment operators, concrete, steel erection, electrical, mechanical, plumbing, fire-protection and fiber trades, followed by a permanent 24-hour operations, security, and maintenance workforce on the order of 1,000 people at full build-out, including on-site contractors. The campus will be one of the largest taxable improvements in the County, supporting County services and schools, while providing its own water, wastewater treatment, roads, and fire protection on site. Electric service is structured so that the facility purchases electricity above the cooperatives' cost of service and the excess is returned to Sulphur Springs Valley Electric Cooperative members as direct rate-reduction credits or is allocated to SSVEC and AEPCO members as

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patronage capital, which the cooperatives retire to members over time. The arrangement is designed to reduce electricity bills primarily for SSVEC customers and also for AEPCO customers statewide, and the load supports the cooperatives' existing generating plant and transmission. Property-tax outcomes are governed by state law and by decisions reserved to the County, its taxing jurisdictions and voters; depending on the decisions those elected officials make, the project is expected to generate on the order of $34 million to $103 million per year in new property-tax revenue across the County's taxing jurisdictions, lowering the burden on existing taxpayers, and the applicant will work with the Board of Supervisors through the Development Agreement on how the community's share is applied. The cooperatives' letters in Appendix J describe the member benefits under negotiation in their own words: reductions in residential electric bills, additional cooperative margins that could support the return of patronage capital to members, and funding for education and community programs through the SSVEC Foundation.

- Decommissioning. If the campus no longer has a purpose under an approved use, the applicant will decommission the facilities and restore the land to a safe, stable condition suitable for the uses allowed in the district, as described in the Operations Narrative; the details, including the restoration period, will be carried into the Development Agreement.

The following documents are enclosed as appendices to this letter:

Appendix A – Special Use Authorization Application (County form)
Appendix B – Data Center Supplemental Form (County form)
Appendix C – Parcel (APN) List (both properties)
Appendix D – Concept Site Plan (D-1 AEPCO property, five buildings; D-2 Southline Transmission property, four buildings)
Appendix E – Operations Narrative (including wildlife and habitat commitments)
Appendix F – Water Narrative (Water Use Plan)
Appendix G – Fire Protection and Emergency Response Narrative
Appendix H – Hazardous or Polluting Materials Attachment (Supplemental Question 22)
Appendix I – Request for Modification of Development Standards (building height, site coverage, and 24-hour construction)
Appendix J – Utility Availability Narrative, with SSVEC and AEPCO electric service documentation (Section 2.51.040.3.c)

Submitted separately through the County portal: the Citizen Review summary, to be supplemented with a summary of the November 4, 2026 community meeting (attendance, concerns raised, sign-in sheet) before the hearing agenda is published; the non-refundable processing fee of $2,500 ($500 plus $20 per acre, capped at $2,000). The owner authorization and Proposition 207 waiver of Arizona Electric Power Cooperative, Inc. is submitted with this application. If additional land comes under the applicant's control and is added to the campus, the Proposition 207 waiver for that land will be submitted at that time.

We appreciate the time Development Services staff spent with us at the pre-application meeting and look forward to the Planning and Zoning Commission hearing. Please direct questions about the application to the undersigned.

Sincerely,

Michael Smith
Authorized Representative
Tombstone Resources L.L.C.
600 Peachtree Street NE, Suite 5200, Atlanta, Georgia 30308
info@tombstoneresources.com

Appendix A

Special Use Authorization Application
(Cochise County Development Services form)

Completed County form covering both properties, followed by the executed Property Owner Authorization and Proposition 207 Waiver of Arizona Electric Power Cooperative, Inc. (Patrick F. Ledger, October 29, 2026, with the 26 AEPCO parcels listed).

COCHISE COUNTY
Arizona

Special Use Application

Development Services
520-432-9300
developmentservices@cochise.az.gov
www.cochise.az.gov
1415 Melody Ln, Bdg F
Bisbee, Arizona 85603

Special Uses are activities or uses that, because of their unique characteristics, potentially could generate greater impacts than uses permitted in a zoning district. Due to these greater impacts, special uses are not granted administratively. Rather, they must be reviewed and approved by the Planning and Zoning Commission at a public hearing.

Applicant Info

Name: Tombstone Resources L.L.C. – Contact: Michael Smith, Authorized Rep., info@tombstoneresources.com

Describe your relationship to this application (select one):

☐ Property owner (skip next question) ☑ Authorized agent

By typing their name below, the undersigned, registered property owner of the property subject to this application, hereby grants the authorized agent noted above to act on their behalf and take all actions necessary for the processing, issuance and acceptance of this permit or application.

Signature: Date:

Property Info

Property Owner Name(s): AEPCO (Arizona Electric Power Cooperative, Inc.) – approx. 400 ac; Southline Transmission – approx. 348 ac

Parcel Number (APN): Multiple – 31 parcels on two properties (26 AEPCO, 5 Southline Transmission; 204-xx-xxx / 205-xx-xxx); see attached Parcel (APN) List

Property Size (in acreage or square feet): Approx. 747 acres (two properties: approx. 400 ac AEPCO + approx. 348 ac Southline)

Property Zoning Designation: RU-4 (Rural, 4-acre minimum lot) – Cochise County

Processing Fees

$500 + ($20/acre, ($2,000 acreage fee max)) Applicants may pay online with a credit card or mail a check to the Development Services Department at 1415 W Melody Ln, Building F, Bisbee, AZ 85603, payable to the Cochise County Treasurer.

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Required Submittals

- [x] This application
- [x] A concept plan
- [x] A copy of the neighborhood notification letter and any information provided to the public
- [x] A non-refundable processing fee

Project Info

Identify the utility company/service provider for each of the following services and state if additional provisions or future connections are required in the space below.

Service	Utility Company/Service Provider
Water/Well	No production well. Domestic: small on-site potable system or trucked potable water. Non-potable (fire reserve, construction, loop makeup): treated process water from the adjoining AEPCO Apache Station (preferred) or trucked water. Dry-cooled, no cooling-tower water. See Water Narrative.
Sewer/Septic*	No public sewer available. Proposed on-site wastewater treatment system (septic / ADEQ-permitted OWTS) sized for the operations crew. Systems are proposed, not existing; locations and 100% expansion areas are shown on the concept plan.
Electricity	Sulphur Springs Valley Electric Cooperative (SSVEC) with AEPCO / Arizona G&T: grid service from the adjoining Apache Generating Station to a utility-owned substation on site. Natural-gas standby generators for critical loads only. See Appendix J.
Fire Protection	Not in a fire district. On site: fire-water tank, redundant fire pumps, private hydrant loop; wet-pipe sprinklers and voice/strobe alarm; clean-agent suppression and pre-action sprinklers in halls; hydrants at battery yards. Aid agreement to be sought with Sunsites-Pearce FD; its assessments paid if agreed. See Fire Narrative.
Waste Disposal	Private licensed solid-waste hauler under contract to a permitted landfill (provider to be selected). Construction debris removed by contractor. Batteries, electronics and treatment chemicals via licensed recyclers / manufacturer take-back. No County collection service required.

* If the property is, or will be, served by a septic system, indicate the location of the septic system and the 100% expansion area on the site plan. State whether the system is existing or proposed.

Is this request consistent with all deed restrictions or private covenants in effect for this property? If applicable, please include a copy of these restrictions/covenants with this application.

- [ ] Yes
- [ ] No
- [x] N/A, no deed restrictions

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Supplemental Questions

1. Please state the reason for this request and why it should be supported.

Tombstone Resources L.L.C. requests Special Use Authorization under Sec. 2.51.040 for a grid-served supercomputer / data-center campus on approx. 747 acres of RU-4 land on two properties along U.S. Highway 191, each adjoining AEPCO's Apache Generating Station lands (approx. 400 acres owned by AEPCO; approx. 348 acres owned by Southline Transmission), both in this one request; a data center is a Special Use in the Rural district. Support: (1) Location – the site adjoins an existing generating station and high-voltage transmission, so power comes from the grid, with natural-gas standby units for critical loads only. (2) Water – dry-cooled, no cooling towers and no evaporative spray in normal operation; total operational use is about 7 to 10 acre-feet per year, about that of 20 to 30 Arizona homes; no new Willcox AMA production well. (3) Compatibility – setbacks well beyond the RU minimums, interior equipment yards, low-rpm fans, minimized dark-sky lighting, perimeter fencing and a native vegetation buffer, modest occupancy and traffic; Willcox Playa wildlife measures (Operations Narrative). (4) Economic benefit – a multi-year construction program employing thousands of trades workers (on the order of 5,500 at peak), a permanent 24-hour operations, security and maintenance workforce (about 1,000 at full build-out, incl. on-site contractors), and one of the largest taxable improvements in the County, with no demand on County water, sewer, roads or fire services. Under the cooperative agreement being negotiated (subject to ACC approval), the campus pays a premium above the cooperatives' cost of service that funds permanent SSVEC equity, a direct reduction in SSVEC member rates and the SSVEC Foundation, and a fee to AEPCO that supports electrical infrastructure and lower transmission costs for its members (Appendix J, Sec. 5). Property-tax outcomes are decided by the County, its taxing jurisdictions and voters, and will be addressed with the Board through the Development Agreement. Requested modifications: RU height (buildings and outdoor mechanical equipment to 40 ft; Sec. 2.51.040.5.a), site coverage (to 50%) and 24-hour construction (Appendix I).

2. Describe all **existing** structures/uses present on the subject property. Note: Show the location and size of existing structures on the accompanying site plan.

Both properties are vacant, undeveloped high-desert rangeland with no habitable structures. Existing features are limited to unpaved ranch/utility two-track roads, fence lines, and electric transmission/utility easements that cross or border the parcels. A dedicated public right-of-way (Docket 742, Page 82) crosses the AEPCO property; its abandonment has been submitted to Cochise County. ADOT parcel 205-03-009 is being transferred to AEPCO for inclusion.
Adjoining (off-site): AEPCO's Apache Generating Station and its evaporation/ash ponds to the west and southwest, and U.S. Highway 191. No existing buildings are proposed to remain or be reused. Existing features are shown on the concept plan aerial base.

3. Describe all **proposed** structures/uses that will be placed on the property. Note: Show the location and size of proposed structures on the accompanying site plan.

A grid-served supercomputer / data-center campus built in four phases to up to nine (9) computing buildings, approx. 6 GW (6,000 MW) total, on two properties under this one request: five on the approx. 400-acre AEPCO property (Sheet D-1) and four on the approx. 348-acre Southline Transmission property (Sheet D-2). Each building is a pre-engineered metal structure about 1,900 ft x 260 ft (about 493,000 SF; roof height 38 ft 8 in) with eight computing halls. Supporting uses: dry-cooler yards at each building; a utility-owned substation at the southwest corner of the AEPCO property and transformer yards; screened battery energy-storage yards for ride-through; electrical buildings; an operations and security building; fire-water tank and pump house; on-site septic systems; stormwater retention basins; private loop roads; U.S. 191 driveways; security fencing at building and equipment pads and where required along the property line, with gates; parking; temporary gravel construction laydown yards and worker parking; and similar accessory uses customarily incidental to a data center. No cooling towers; natural-gas standby generators (approx. 10 MW per building) serve critical loads only. Off-site transmission and the 345 kV interconnection are not part of this request. Setbacks exceed the RU minimums: 100 ft from property lines to buildings, substation and water plant; 150–200 ft from any dwelling to buildings; 200–300 ft from any dwelling to cooling yards and transformers; 50–100 ft landscape/berm screening along U.S. 191 and occupied parcels. Concept-plan locations and sizes are conceptual; adjustments within the approved limits are handled at building permit.

4. What materials will be used to construct the new building(s)? (Note, for an existing building(s), please also list the construction type(s), i.e., factory-built building, wood, block, metal).

Computing buildings: pre-engineered metal buildings (PEMB) – steel framing with insulated metal wall and roof panels on concrete slabs. Electrical and operations buildings: PEMB or masonry with metal roofs. Outdoor equipment (dry coolers, transformers, battery containers, generator enclosures, tanks) on concrete pads in gravel or paved yards; steel security fencing with earth-tone screening where visible from U.S. 191. Roofs white for heat rejection; wall colors coordinated with the County, earth tones where visible from the highway. Roof height 38 ft 8 in; the applicant requests that this SUA modify the 30-ft Rural height limit (Sec. 2.51.040.5.a) to allow computing buildings and outdoor mechanical equipment (dry coolers ~38 ft, tanks) to 40 ft. The substation is utility-owned and height-exempt; applicant electrical equipment is under 30 ft.

5. Will the project be constructed/completed within one year or phased?

☐ One year ☑ Phased

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Supplemental Questions Continued

5.a. If this is a phased project, describe the phases here and physically depict them on the site plan.

Phase 1 (approx. one to two years from start of vertical construction to occupancy; phases overlap): mass grading and drainage, the U.S. 191 driveways, campus loop road, fire-water system, substation/transformer yard, battery yards, operations building, and the first computing buildings (approx. 1,500 MW) with their dry-cooler yards. Initial electric service for construction is targeted for April 2027; the Phase 1 computing load follows as the transmission facilities are completed. Later phases add computing buildings, each with its cooler yard and electrical additions, as utility capacity and demand support them. Full build-out is up to nine buildings (approx. 6 GW) across both properties: five on the AEPCO property and four on the Southline Transmission property. If parcels north of the AEPCO property are secured, the applicant expects to seek an amendment to add them to the campus. Phases are depicted on the concept plans. One Special Use Authorization is requested for the campus as a whole; building permits are obtained phase by phase.

6. Describe all intermediate and final products/services that will be produced/offered/sold, if applicable.

No physical products are manufactured, stored or sold on the site. The campus provides high-performance computing (training and operation of artificial-intelligence models), primarily for the applicant and its affiliates. The output is digital and leaves the site by fiber-optic telecommunications. No retail, walk-in or visitor services are proposed. Intermediate services are limited to the campus's own electrical distribution, cooling and security systems.

7. What are the days of the week and hours of operation (if applicable)?

The computing campus operates 24 hours a day, 7 days a week, 365 days a year once a building is placed in service; there is no daily shutdown or seasonal idle. Operations and security staff are on site around the clock. Construction may proceed around the clock to meet the schedule; deliveries and maintenance are scheduled as needed. Standby generators run only during utility outages and routine scheduled testing.

8. What are the number of employees expected to work onsite?

Initially: Est. ~250 (Phase 1: operations, security, maintenance)

Future: Est. ~1,000 at full build-out (both properties), incl. on-site contractors

9. Describe the permanent legal access to the property. State which streets or easement will be used by traffic to enter or exit the property. Specify whether the vehicular access is from a public road, private road, or easement, and label all legal access on the concept plan.

Legal access is directly from U.S. Highway 191, a public (ADOT) highway, via new all-weather driveway connections subject to ADOT approval, labeled on the concept plan. Interior roads are private campus roads owned and maintained by the applicant. Any shared access easement with AEPCO (to be granted under the purchase contract) will have a written maintenance agreement before building permit.

10. What impact will this have on the traffic volume of roads that serve the subject property?

Peaks during construction, lower in operation. Construction employment is in the thousands (on the order of 5,500 at peak). A worker shuttle from off-site park-and-ride lots (U.S. 191 / I-10 corridors) carries most of the workforce; with staggered shifts around the clock, est. peak: ~80 buses, ~1,000–1,300 passenger vehicles and ~150–250 trucks per day (each in and out) spread over all hours. All-hours traffic management plan and ADOT traffic impact analysis to be provided; turn lanes as ADOT requires. Operation: est. ~150–200 vehicles/day initially, ~600–700/day at full build-out (~1,000 staff), ~5–10 trucks/day.

10.a. Number of passenger vehicles entering and leaving the site (per day/week)? Ops ~150–700/day; constr. see Q10

10.b. Number of large trucks entering and leaving the site (per day/week)? Ops est. ~5–10/day; constr. peak ~150–250/day

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10.c. At what time of day, day of week, and season (if applicable) will traffic be the heaviest?

During construction, work proceeds around the clock with staggered shift starts and a worker shuttle, so traffic is spread across all hours rather than concentrated at one shift change; the busiest period is the weekday day-shift start and end (on the order of 300–400 vehicles and buses in the peak hour); deliveries are scheduled through the day. No seasonal peak. During operation, traffic is modest and steady year-round with no concentrated shift change; the heaviest operating traffic is on weekdays when maintenance contractors and deliveries are on site.

11. How many driveway cuts are proposed along streets or easements to allow site access? State whether this is an increase/decrease and whether any existing cuts will need relocation.

Four (4) new driveway connections to U.S. Highway 191 are proposed, two on each property (an increase of four), subject to ADOT approval. No existing driveway cuts require relocation; existing informal ranch/utility two-track access points will be closed or consolidated into the new driveways. Driveway geometry and encroachment permits will be obtained from ADOT.

12. What is your water source? If your property is served by a well, show the existing or proposed location of the well on the site plan. State whether the well is private or shared (if applicable).

No production well. Non-potable (fire reserve, construction, loop makeup): treated process water from adjoining AEPCO Apache Generating Station or trucked water. Domestic: small on-site potable system or trucked potable water. Dry-cooled – no cooling-tower water. Total ~2.3–3.3 million gal/yr (7–10 AF/yr) at full build-out of both properties (AEPCO property ~55%); see Water Narrative.

13. Total gallons of water needed for the proposed use, either daily or annually: Est. ~2.3–3.3 MG/yr

14. List any strategies you will use on site to minimize water use, recycle water, and/or enhance onsite natural recharge.

• Dry cooling: closed liquid loops rejecting heat through fan-cooled finned-tube dry coolers, with a floating loop temperature on the hottest hours – no cooling towers and no evaporative spray in normal operation, which eliminates the dominant water use of a conventional data center.
• Closed loops are chemically treated and recirculated; makeup is a small maintenance quantity. The one-time fill of the loops comes from non-potable sources (station wastewater reuse or trucked water), without new pumping from the Willcox basin aquifer.
• Non-potable water for fire reserve, construction and dust control, sourced from the adjoining generating station's existing process water; potable water limited to drinking and sanitary use for the operations crew.
• No new Willcox AMA production well for cooling.
• Native, unirrigated landscape after establishment; stormwater retention basin and preserved natural washes to promote on-site infiltration and recharge.
• Leak detection on the closed loops.

15. Describe your citizen review process. Specifically, state whether you received any responses to your mailed notice or public meeting. Explain how your special use application has incorporated the feedback you received. Upload a copy of the mailed notice to the portal.

In accordance with the County's Citizen Review requirement, the applicant mailed written notice of the proposed Special Use to all property owners of record within the required radius, and to the Sunsites-Pearce Fire District and AEPCO, on October 16, 2026. The notice described the project (grid-served, dry-cooled data-center campus; no on-site power generation; phased construction), identified the parcels and U.S. 191 access, and invited written comment. The application already addresses the concerns raised most often about data centers by committing to dry cooling with no cooling towers, interior placement of cooler yards with buildings as sound buffers, minimized shielded dark-sky lighting, setbacks from U.S. 191 and neighboring residences, and wildlife measures for the nearby Willcox Playa. A community meeting is planned for November 4, 2026; its summary and sign-in sheet will be provided through the County portal before the hearing agenda is published.

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Special Use Authorization Application

Supplemental Questions Continued

15.a. Date of mailing by applicant: October 16, 2026

15.b. Mailing radius: 1 mile – all owners of record within one mile of both properties

16. Describe any outdoor activity associated with your special use proposal, if applicable.

Outdoor activity is limited to the operation and maintenance of fixed equipment in fenced yards: dry-cooler arrays (electric fans), the utility substation and transformers, battery energy-storage containers, standby generator enclosures, fire-water tanks and pump house, and the stormwater basin. Routine activity consists of security patrols, maintenance technicians servicing outdoor equipment, and deliveries at building loading areas. No outdoor manufacturing, processing, retail, events or public assembly. During each construction phase, normal site-work, laydown and equipment staging occur within the fenced campus.

17. Will outdoor storage of equipment, materials or products be needed? If yes, show the location on the site plan. Describe any measures to be taken to screen this storage from neighboring properties.

Minimal. Spare parts and maintenance materials are kept inside buildings or in enclosed containers within the fenced equipment yards. Temporary construction laydown yards, worker parking and the shuttle drop-off area are within the campus, gravel-surfaced, and shown on the concept plan. Permanent outdoor equipment yards are set back from U.S. 191 and property lines, placed toward the interior behind buildings, and enclosed by security fencing with earth-tone screening/berms where visible. No outdoor storage of products.

18. Will any noise or vibrations be produced that can be heard or felt on neighboring properties on a regular basis? if yes; describe the level and duration of this noise. What measures are you proposing to prevent this noise from being heard on neighboring properties?

The principal sound sources are the outdoor dry-cooler fans and transformers. Dry coolers are about 38 ft tall with large (~16 ft), slow-turning fans (on the order of 250 rpm) selected for low sound; they sit more than 1,000 ft from U.S. 191 (the Apache Station cooling towers stand within a few hundred feet of the highway). Cooler arrays are located toward the interior of the campus with buildings and equipment yards between the coolers and the perimeter, and are set back from U.S. 191 and adjoining parcels. Fan speed follows cooling load and outdoor temperature, so fans run slower at night and in cooler months. Standby generators are in sound-attenuated enclosures and run only during utility outages and routine testing. No vibration is perceptible off site. The applicant will design to a property-line sound level consistent with the surrounding rural industrial area, which includes the adjoining generating station and highway, and confirm it with a noise study at building permit.

19. Will odors be created? If yes, what measures will be taken to prevent these odors from escaping onto neighboring properties?

No. The campus has no continuous combustion processes, no cooling towers and no industrial process emissions; the computing equipment and dry coolers produce only warm air, and natural-gas standby generators run only during outages and routine testing. Domestic wastewater is handled by an ADEQ-permitted on-site treatment system designed and maintained to prevent odor. Solid waste is stored in closed containers and hauled regularly. Temporary construction equipment exhaust is the only other source and ends with construction.

COCHISE COUNTY Arizona

Supplemental Questions Continued

20. Will any on-site activities attract pests, such as flies or mice? If yes, what measures will be taken to mitigate/discourage their presence?

No. There is no food processing, agriculture, outdoor refuse or standing process water. Refuse is kept in closed, lidded containers with regular hauling. The stormwater retention basin will be designed to drain within the County/ADEQ standard period after a storm to avoid mosquito breeding. Buildings are sealed industrial structures, and a routine pest-control service will be maintained.

21. Will additional dust be created on a regular basis? If yes, what measures will be taken to prevent this dust from escaping onto neighboring properties or roadways?

During construction, yes – temporarily. Measures: ADEQ dust-control/earthmoving permit and AZPDES Construction General Permit with a SWPPP; phased clearing so only the active phase is disturbed; watering with non-potable water; application of a polymer soil stabilizer (e.g., Soilworks Gorilla-Snot) to disturbed areas, haul roads and laydown yards; stabilized construction entrances and track-out control at the U.S. 191 driveways; speed limits on haul roads; revegetation of disturbed areas not under construction. During operation, roads and yards are paved or gravel-stabilized and traffic is low, so no regular dust is generated.

22. Will the proposed use involve the on-site storage or use of fuels, chemicals, compressed gases, pesticides, fertilizers, paints, solvents, oils, or other substances that are flammable, corrosive, reactive, or toxic? If yes, please complete a "Hazardous or Polluting Materials Attachment" and attach it to this application.

☑ Yes ☐ No

23. Do you anticipate the need to clear more than one acre of vegetation? If so, describe the proposed dust and erosion control measures to be used and show their approximate location on site plan, if appropriate. Also, indicate if any drainage pattern alterations are proposed or necessary.

Yes – several hundred acres will be cleared over the phases. Dust and erosion controls: AZPDES Construction General Permit and SWPPP (silt fence, fiber rolls, stabilized entrances, inlet protection), ADEQ dust-control permit, phased disturbance, watering, a polymer soil stabilizer (e.g., Soilworks Gorilla-Snot) on disturbed areas, and revegetation of areas not built. Drainage: the applicant will meet the Cochise County Floodplain Regulations and Stormwater Ordinance. A drainage analysis certified by an Arizona registered civil engineer, with grading plans and a drainage report, will be submitted before construction, and a Floodplain Use Permit obtained for any work in a regulatory floodplain or erosion-hazard area. Existing washes shown on the concept plan will be conveyed through or around the campus; finished floors will be set at least 1 ft above the determined water surface; retention/detention will hold post-development discharge at or below pre-development rates with no adverse impact to adjacent parcels or roads, and basins will drain within 24 hours.

Acknowledgments

By typing their name below, the applicant certifies that all information in this application, on the site plan, and within any supplemental documents is true and accurate. They understand that if any information is false, it may be grounds for revocation of this permit. In addition, they hereby request all inspections necessary to process this application, and if the permit is issued, they request all inspections necessary to monitor progress, and document completion, at all stages of the work related to this permit.

Applicant Signature: Michael Smith, Authorized Representative Date: 10/30/2026

Acknowledgments Continued, Prop 207 Waiver

By typing their name below, the property owner acknowledges that the approval being sought by this application may cause a reduction in the existing rights to use, divide, sell or possess the private property that is the subject of this application. The property owner further acknowledges that it is the property owner who has requested the action sought by the filing of this application. Therefore, with full knowledge of all rights granted to the property owner pursuant to A.R.S.§12-1132 through 1138, the property owner does hereby waive any and all claims for diminution in value of the property with regard to any action taken by Cochise County as result of the filing of this application.

Signature (Property Owner): Date:

See submitted signed 207 Forms provided by the county.

PROPERTY OWNER AUTHORIZATION AND PROPOSITION 207 WAIVER

Tombstone Resources LLC | SUP 26-XX (191 Data Center and BESS)

To: Cochise County Development Services

Project location: Near Apache Generating Station, east of U.S. Highway 191, unincorporated Cochise County, Arizona.

PROPERTY AND OWNER IDENTIFICATION

Property owner(s), exactly as titled: Arizona Electric Power Cooperative Inc.

Assessor Parcel Number(s) (APNs):

See attached list

List every parcel covered by this authorization. Attach a parcel schedule if necessary and have the signing owner initial each attached page.

1. AUTHORIZATION TO PARTICIPATE IN SPECIAL USE APPLICATION

The undersigned property owner(s) authorize Tombstone Resources LLC, or its designated representative, to include the property identified above in its application for Special Use Authorization for the proposed data center / supercomputing facility, and to submit and process that application and supporting materials on the owner's behalf. This authorization applies only to the identified property and does not constitute County approval or authorize construction.

2. PROPOSITION 207 ACKNOWLEDGMENT AND WAIVER

By signing below, the property owner acknowledges that the approval being sought by this application may cause a reduction in the existing rights to use, divide, sell or possess the private property that is the subject of this application. The property owner further acknowledges that it is the property owner who has requested the action sought by the filing of this application. Therefore, with full knowledge of all rights granted to the property owner pursuant to A.R.S. §§ 12-1132 through 12-1138, the property owner does hereby waive any and all claims for diminution in value of the property with regard to any action taken by Cochise County as a result of the filing of this application.

OWNER SIGNATURE(S) — AUTHORIZATION AND WAIVER

By signing, each undersigned owner agrees to both Sections 1 and 2 above for the identified property.

Signature: _____ Date: October 29, 2026

Printed name: Patrick F. Ledger Title / capacity: Executive Vice President & CEO

Signature: _____ Date:

Printed name: Title / capacity:

For property held by a trust, corporation, LLC or other entity, identify the authorized signer and provide evidence of authority upon request. Additional owners may sign a duplicate of this page identifying the same APNs.

Property Owner Authorization and Proposition 207 Waiver
Assessor Parcel Numbers

20423006B
20423007A
20423004
20504001
20503002A
20503002B
20503002C
20503002D
20503008
20503013
20503016
20503017
20503009
20503012
20503011A
20503011B
20503010A
20503010B
20503007
20503001B
20423006A
20423005D
20423005E
20423005F
20423005G
20423005H

Appendix B

Data Center Supplemental Form
(Cochise County Development Services form)

Completed County supplemental form for the campus of up to nine computing buildings on both properties.

COCHISE COUNTY
Arizona

Development Services
520-432-9300
developmentservices@cochise.az.gov
www.cochise.az.gov
1415 Melody Ln, Bdg F
Bisbee, Arizona 85603

Data Center Supplemental Form

A data center is a facility, or primary use within a facility, that houses computer systems and related equipment for storing, processing, managing, or transmitting digital data, including colocation, cloud computing, and third-party hosting services, along with associated cooling, power, and security infrastructure. The term excludes accessory server rooms or data-processing equipment used primarily for an owner's internal operations, including affiliated agencies or partners, and excludes battery energy storage systems used primarily for electric generation or grid export. This form must be submitted as an attachment to the special use application.

Project Information

Project Name:	Cochise Supercomputer Campus – AEPCO and Southline Transmission properties (Tombstone Resources L.L.C.)
Proposed Facility Size (SF):	~493,000 SF per building; up to 9 buildings, ~4.4 million SF, on two properties
Estimated Peak Electrical Demand (MW):	~6 GW (6,000 MW) at full build-out in four phases; Phase 1 ~1,500 MW
Electrical service provider (if known):	SSVEC with AEPCO / Arizona G&T – see Appendix J
Telecommunications provider(s) (if known):	Fiber-optic service – see Appendix J

Project Description

Briefly describe the proposed Data Center operation:

A grid-served supercomputer / data-center campus on approx. 747 acres of RU-4 land on two properties along U.S. Highway 191, each adjoining AEPCO's Apache Generating Station lands (approx. 400 acres owned by AEPCO; approx. 348 acres owned by Southline Transmission), both under this one Special Use Authorization. Built in four phases to up to nine pre-engineered metal computing buildings, approx. 6 GW (6,000 MW): five on the AEPCO property and four on the Southline property. Each building is about 1,900 ft x 260 ft (roof height 38 ft 8 in) with eight computing halls. Supporting uses: utility-owned substation and transformer yards, electrical buildings, operations and security building, fire-water tank and pump house, septic systems, stormwater retention, private loop roads, U.S. 191 driveways, security fencing at the building and equipment pads and where required along the property line, and similar accessory uses. Use: owner-operated high-performance computing for AI model training and inference, primarily for the applicant and its affiliates; no retail, walk-in or visitor services.
Power: grid service to a utility-owned substation on site. Standby generation is limited to approx. 10 MW of pipeline-fed natural-gas generators per building for critical services only (a temporary code-permitted natural-gas supply may precede pipeline service). Ride-through by battery energy storage in screened yards (listed containers spaced per NFPA 855 and the listing, built-in detection and safety systems monitored 24/7, hydrants for exposure protection).
Cooling: closed liquid loops from the racks to in-building heat exchangers, with heat rejected through fan-cooled dry coolers. No cooling towers and no evaporative spray in normal operation; cooling water is limited to small closed-loop makeup; drained loop water is contained and trucked off site. Non-potable water for the one-time loop fill, fire reserve and construction from the adjoining station's treated wastewater or trucked water; no new Willcox AMA production well. Operation: 24 hours a day, 365 days a year, with a 24-hour operations, security and maintenance crew (on the order of 1,000 at full build-out, including on-site contractors) and modest traffic; lighting during operations minimized (off or dimmed except where work or security requires; shielded dark-sky fixtures). Fire protection on site: fire-water tank with redundant pumps and private hydrant loop; wet-pipe sprinklers and voice/strobe alarm; clean-agent suppression plus pre-action sprinklers with ceiling, underfloor and aspirating detection in each hall; pre-action sprinklers in electrical buildings. Outside any fire district; a response agreement will be sought with the nearest district.

COCHISE COUNTY Arizona

Data Center Supplemental Form

Project Description Continued

Check all services that will be provided:

- [ ] Colocation Services
- [ ] Cloud Computing
- [ ] Third-Party Data Hosting
- [ ] Enterprise Data Storage
- [x] Other — Owner-operated high-performance / AI computing (model training and inference), primarily for the applicant and its affiliates; no retail or walk-in services

Required Submittals

- [x] Conceptual Site Plan. A site plan showing the general location of proposed buildings, equipment areas, access points, fencing, screening, lighting, generators, fuel storage (if applicable), and other major site features sufficient to evaluate land use compatibility and potential impacts.
- [x] Operational Narrative. Brief description of the proposed facility and its operations, including cooling systems, backup power, and other operational features relevant to the Special Use Permit review.
- [x] Utility Availability Information demonstrating that adequate electrical and telecommunications services are available or can be provided to serve the proposed facility.
- [x] Water Use Plan (required only if water-based cooling, humidification, or other routine operational water use is proposed).
- [x] Fire Protection and Emergency Response Narrative (required if the site is outside an established fire district or municipal fire service area).
- [ ] Additional Studies required by the County based on site-specific conditions, if applicable.

Supplemental Questions

Water Use: Will the facility use water for cooling, humidification, or other routine operations?

- [x] Yes
- [ ] No

If yes, identify the proposed water source(s):

- [ ] Municipal Water
- [ ] Private Well
- [ ] Reclaimed Water
- [x] Other — Non-potable process water from adjoining AEPCO Apache Station or trucked water.

COCHISE COUNTY Arizona

Data Center Supplemental Form

Supplemental Questions

Backup Power/Fuel Storage: Will the facility include backup generators?

☑ Yes ☐ No

Backup Power/Fuel Storage: Will fuel be stored on-site?

☐ Yes ☑ No

If yes, identify the fuel type:

☐ Diesel ☑ Natural Gas

☐ Propane ☐ Other

Pipeline natural gas – no permanent on-site fuel storage (a temporary code-permitted natural-gas supply may precede pipeline service)

Fire Protection: Is the site located within an established fire district?

☐ Yes ☑ No

If no, identify the anticipated emergency response provider, if known:

Sunsites-Pearce Fire District (Station 2, 6 E. Havasu Way, Cochise; Station 1, 105 N. Tracy Rd., Pearce) by subscription/automatic-aid agreement to be requested before building permit; Willcox Fire-Rescue (secondary). 911 via Southeast Arizona Communications; AZ Dept. of Forestry & Fire Mgmt (wildland); Cochise County Sheriff; County LEPC (haz-mat). On-site systems are the primary protection – see Fire Protection & Emergency Response Narrative.

Site Compatibility: Are there residentially used properties adjacent to or near the site?

☑ Yes ☐ No

Briefly describe any proposed screening, buffering, landscaping, or other measures intended to minimize visual, noise, or operational impacts on surrounding properties.

• Siting and setbacks (exceed RU minimums): 100 ft from property lines to buildings, substation and water plant; 150–200 ft from any dwelling to buildings; 200–300 ft to cooling yards, generators and transformers; equipment yards toward the interior. Height 38 ft 8 in; modification to 40 ft requested for buildings and outdoor mechanical equipment (dry coolers ~38 ft); substation utility-owned (exempt).
• Noise: standby generators in sound-attenuated enclosures run only in outages and tests; dry coolers (~38 ft tall, ~16 ft low-rpm fans that slow at night) sit >1,000 ft from U.S. 191; property-line levels consistent with the surrounding rural industrial area.
• Visual and lighting: white roofs, wall colors coordinated with the County (earth tones where visible from U.S. 191), earth-tone fencing with screening/berms, native vegetation buffer, no stacks or plumes; operations lighting minimized (off or dimmed except where work or security requires), fully shielded, warm-spectrum, downward-directed dark-sky fixtures, motion control in yards, no uplighting.
• Wildlife (near Willcox Playa): no cooling towers, ponds or open water; bird-safe glazing; basins drain in 24 hours with wildlife ramps; wildlife-friendly fencing (visible top rail, no barbed wire) except where security fencing is required; design shared with AZGFD/USFWS; biological assessment before ground disturbance (Ops Narrative Sec. 14).
• Water, odor, dust, stormwater: dry-cooled, no plumes, drift or process odors; construction dust control; County Floodplain and Stormwater rules with a certified drainage analysis. Traffic: controlled U.S. 191 driveways; modest operating traffic; around-the-clock construction (~5,500 workers at peak) with a worker shuttle from off-site park-and-ride lots, staggered shifts, an all-hours traffic plan and an ADOT traffic impact analysis. Decommissioning per Ops Narrative Sec. 11 if the campus no longer has a purpose under an approved use.

Appendix C

Parcel (APN) List

Assessor parcels for both properties: 26 AEPCO parcels (approx. 400 acres) and 5 Southline Transmission parcels (approx. 348 acres).

TOMBSTONE RESOURCES L.L.C.
600 Peachtree Street NE, Suite 5200 · Atlanta, Georgia 30308

Special Use Authorization Application · Attachment: Parcel (APN) List

Applicant: Tombstone Resources L.L.C. · Property owners: Arizona Electric Power Cooperative, Inc. (AEPCO) and Southline Transmission

Property: vacant land on two properties along U.S. Highway 191, each adjoining the Apache Generating Station lands, Cochise, Cochise County, AZ 85606 · Zoning: RU-4 · Area: approx. 747 acres total (approx. 400 acres AEPCO + approx. 348 acres Southline Transmission) · One Special Use Authorization for both properties

A. AEPCO property — Cochise County Assessor Parcel Numbers (26 parcels), per Vacant Land Purchase Contract Sec. 8a (executed 9/3/2026):

1. 204-23-004
2. 204-23-005D
3. 204-23-005E
4. 204-23-005F
5. 204-23-005G
6. 204-23-005H
7. 204-23-006A
8. 204-23-006B
9. 204-23-007A
10. 205-03-001B (portion)
11. 205-03-002A
12. 205-03-002B
13. 205-03-002C
14. 205-03-002D
15. 205-03-007
16. 205-03-008 (portion)
17. 205-03-009 *
18. 205-03-010A
19. 205-03-010B
20. 205-03-011A
21. 205-03-011B
22. 205-03-012
23. 205-03-013
24. 205-03-016
25. 205-03-017
26. 205-04-001

B. Southline Transmission property — Cochise County Assessor Parcel Numbers (5 parcels), approx. 347.8 acres:

27. 205-14-003B
28. 205-14-004A
29. 205-16-004
30. 205-16-005
31. 205-18-001

* 205-03-009: ADOT has approved disposal of this parcel to AEPCO; appraisal and survey to complete the transfer are in progress. Abandonment of the public right-of-way dedicated in Docket 742, Page 82 has been submitted to Cochise County.

Parcel boundaries and the project area for each property are shown on the attached concept plans (Appendix D, Sheets D-1 and D-2) and on the KMZ/GIS files provided to the County.

Appendix D

Concept Site Plan

D-1 AEPCO property — five computing buildings (Sheet C201, October 29, 2026): buildings, cooler and battery yards, substation, loop roads, U.S. 191 driveways, fencing, and temporary construction laydown and worker parking areas.

D-2 Southline Transmission property — four computing buildings (Sheet C201, October 29, 2026).

Both properties are included in this Special Use Authorization. Building locations, sizes and equipment layouts are conceptual; adjustments within the approved setbacks, height and coverage limits are handled at building permit.

SUPER COMPUTE CONCEPT PLAN
3500 MW LAYOUT (700 MW BUILDING)

ARIZONA ELECTRIC POWER PARCELS

WILDLIFE FENCING (TYP)

100-YR FLOODPLAIN

DETENTION FACILITY

100-YR FLOODPLAIN

LAYDOWN/PARKING AREAS (TYP.)

DRY COOLERS (TYP)

SECURITY FENCING (TYP)

MEGAPACKS (TYP)

SEPTIC FIELD (TYP.)

SUMMARY OF MATERIALS

NO	ITEM	UNIT	QTY	NO	ITEM	UNIT	QTY
1				9			
2				10			
3				11			
4				12			
5				13			
6				14			
7				15			
8				16			

TOMBSTONE RESOURCES, LLC

DRAFT

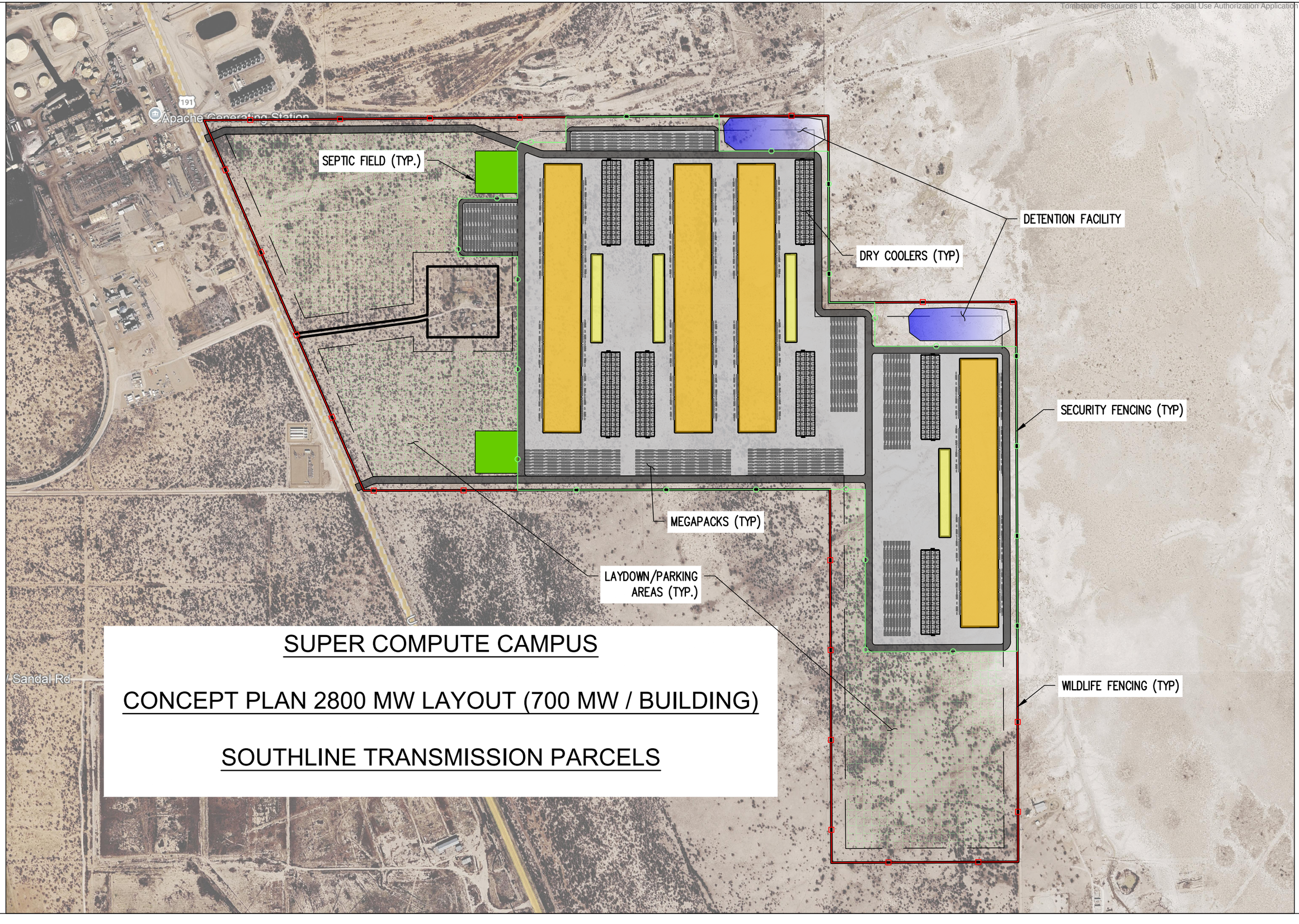
REVISION LIST

NO	DATE	DESCRIPTION

COCHISE, AZ
PLAN VIEW

DRAWN:
CHECKED:
APPROVED:
DATE:
SCALE: N/A
PO#:

C201



SUPER COMPUTE CAMPUS

CONCEPT PLAN 2800 MW LAYOUT (700 MW / BUILDING)

SOUTHLINE TRANSMISSION PARCELS

SUMMARY OF MATERIALS

NO	ITEM	UNIT	QTY	NO	ITEM	UNIT	QTY
1				9			
2				10			
3				11			
4				12			
5				13			
6				14			
7				15			
8				16			

TOMBSTONE RESOURCES, LLC

DRAFT

REVISION LIST

NO	DATE	DESCRIPTION

COCHISE, AZ
PLAN VIEW

DRAWN:
CHECKED:
APPROVED:
DATE:
SCALE: N/A
PO#:

C201

Appendix E

Operations Narrative

Section 2.51.040.3.b. Cooling, emergency power, hours and intensity, materials, phasing, noise, employees, access, traffic, decommissioning, lighting, stormwater, wildlife and habitat commitments (Section 14), and security (Section 15).

TOMBSTONE RESOURCES L.L.C.
600 Peachtree Street NE, Suite 5200 · Atlanta, Georgia 30308

October 30, 2026

Cochise County Development Services
Attn: Christine McLachlan, AICP, Director
1415 W. Melody Lane, Building F
Bisbee, Arizona 85603

Re: Special Use Authorization. Operations Narrative
Conventional building data-center layout, dry-cooled
Data center campus, approximately 747 acres on two properties, Rural zoning
Unincorporated Cochise County, Arizona

Director McLachlan:

This letter accompanies the Special Use Authorization application for a data-center campus on approximately 747 acres zoned Rural, on two properties along U.S. Highway 191 near Cochise, each adjoining Arizona Electric Power Cooperative's Apache Generating Station lands: approximately 400 acres owned by AEPCO and approximately 348 acres owned by Southline Transmission. One Special Use Authorization is requested for both properties. It describes how a conventional building layout would be operated. The campus takes electric service from the grid; standby generation is limited to natural-gas units for critical loads. Engineered mechanical, electrical, and fire-protection drawings will be locked at building permit. This narrative states the operating concept the concept plan will show.

1. Cooling type

Cooling is a closed liquid loop from the computing racks to in-building heat exchangers, with remaining air load handled by in-row air units. The building loop rejects heat outdoors through dry coolers: finned-tube heat exchangers with fans, no evaporation. The campus does not use cooling towers and does not use evaporative spray in normal operation. On the hottest afternoons, the loop temperature is allowed to rise a few degrees and the computing equipment runs slightly warmer for those hours, within its ratings, rather than spraying water. That design choice removes cooling water from the campus.

The outdoor cooler field and the building piping are a campus utility, not a once-through process stream. Makeup to the closed loops is small and chemically managed. A water-treatment program and periodic testing of the loops are part of ordinary operations. Water use for this layout is addressed in the water narrative submitted with this application.

Maintenance of the closed loops follows industry practice for sealed hydronic systems. The loops are filled once, from the non-potable sources described in the Water Narrative, with treated water carrying corrosion inhibitors matched to the piping materials, and are topped off only to replace small losses. All drain points are contained. If a loop must ever be drained, for maintenance of a section of piping or because the water chemistry can no longer be maintained, the water is captured in containment or temporary tanks and either returned to the loop or hauled off site by a licensed carrier for disposal that meets Arizona Department of Environmental Quality, federal and Cochise County standards. No cooling-loop water is discharged to the ground or to stormwater.

2. Emergency power

Normal power is utility service from Sulphur Springs Valley Electric Cooperative and Arizona Electric Power Cooperative, delivered to a utility-owned substation on the campus and distributed to the halls. Standby generation is limited to approximately 10 megawatts of natural-gas-fired generators per computing building. The generators serve critical services only (network, controls and life safety). The generators are supplied by pipeline natural gas; if pipeline service is not yet available when a building opens, a temporary, code-permitted compressed or liquefied natural gas supply may serve the generators until it is, and is removed once pipeline service is in place; any incidental fuels are kept below the quantities that require a fire-code operational permit and will be listed on the hazardous-materials attachment. Generators will be installed and permitted in accordance with applicable fire, air-quality and building codes. Ride-through is provided so a brief disturbance on the grid does not drop the computing load. Short-duration hold-up is at the equipment and in the network rooms. Multi-hour battery energy storage on the campus, in screened yards set back from the halls and from U.S. 191, covers a longer interruption while utility service is restored.

TOMBSTONE RESOURCES L.L.C.
600 Peachtree Street NE, Suite 5200 · Atlanta, Georgia 30308

Uninterruptible-power equipment serving the network rooms is separate from the hall feed.

Transfer between the utility feed and on-site storage is supervised. Tie operations on the medium-voltage system are manual and follow a written procedure so that a tie is not closed into an overloaded condition. Battery containers are listed units, spaced to the adopted energy-storage standard and to the product listing, with detection, gas monitoring, thermal management and electrical isolation built into the product and monitored around the clock by the on-site controls team. Fire protection for the battery yards is private hydrants for exposure protection, as described in the fire-protection narrative; no fixed suppression is proposed on the containers. Trained on-site staff will have the equipment and procedures to respond to a battery incident. A battery decommissioning plan will be provided. The battery yard is reachable from the campus loop without driving through a hall. Detail is a building-permit item and is coordinated with the fire-protection narrative.

3. Hours and intensity of operations

The campus operates twenty-four hours a day, every day of the year, once a hall is placed in service. Computing load is continuous. Design studies use a high, steady load as the conservative case and a reduced utilization case for weather-sensitive systems such as dry-cooler spray. Actual intensity varies with the work running in the halls and with outdoor temperature. Cooling plant output follows that load and the local climate. There is no daily shutdown and no seasonal idle of the computing floors.

Construction and commissioning of a hall are a finite period of heavier staffing and equipment traffic. After turnover, the operating profile is steady-state: continuous computing, continuous cooling, and grid supply. Peak outdoor plant activity tracks hot-weather afternoons. That is a cooling effect, not a change in hours of occupancy by the public.

4. Materials and construction type

The computing halls are pre-engineered metal buildings on conventional foundations, with associated electrical buildings, an operations and security building, outdoor equipment yards for dry coolers, transformers, and batteries, and similar accessory uses customarily incidental to a data center. Interior floors are industrial. Exterior yards are gravel or paved as needed for equipment and fire apparatus. Perimeter fencing and controlled gates enclose the campus. Roof height of the computing buildings is 38 feet 8 inches. The Rural district limit is 30 feet; the applicant requests that this Special Use Authorization modify the height limit under Section 2.51.040.5.a to allow computing buildings and outdoor mechanical equipment, including the dry coolers and tanks, up to 40 feet. The substation will be owned by the serving utility and is exempt from the height limit; the applicant's electrical equipment is below 30 feet, and the dry coolers stand about 38 feet. Proposed setbacks exceed the Rural district minimum of 20 feet: 100 feet from property lines to buildings, the substation and the water plant; 150 to 200 feet from any existing dwelling to buildings; 200 to 300 feet from any dwelling to cooling yards and transformers; and 50 to 100 feet of landscape or berm screening inside the setback along U.S. 191 and occupied parcels. Roofs are white for heat rejection; wall colors will be coordinated with the County, with earth tones where visible from U.S. 191. Finish, color, and screening will meet County standards and will be shown on building-permit elevations.

5. Construction schedule and phasing

The campus is intended to be built in phases. Each construction phase runs approximately one to two years from start of vertical work to occupancy of its halls, and phases overlap. All phases are shown on the concept plan submitted with this application. Full build-out is up to nine computing buildings in four phases, with a total electric demand of approximately 6 gigawatts (6,000 megawatts), across both properties: five buildings on the approximately 400-acre AEPCO property (concept plan Sheet D-1) and four buildings on the approximately 348-acre Southline Transmission property (Sheet D-2). The applicant is pursuing additional parcels north of the AEPCO property and, if they come under its control, expects to seek an amendment to add them to the campus. Building locations, sizes and equipment layouts on the concept plan are conceptual; adjustments that remain within the approved setbacks, height and coverage limits are handled at building permit. Grading, drainage, Highway 191 access, and the campus loop for Phase 1 will be in place before those halls are occupied. The Special Use Authorization is requested for the campus as a whole on both properties; building permits will be taken phase by phase.

TOMBSTONE RESOURCES L.L.C.
600 Peachtree Street NE, Suite 5200 · Atlanta, Georgia 30308

Construction laydown yards, worker parking and the shuttle drop-off area are temporary uses. They are shown on the concept plan, are gravel-surfaced, and are restored or converted as buildings are completed. Most construction workers reach the campus by a worker shuttle from off-site park-and-ride lots, described in Section 10, so on-site worker parking is sized for the share that drives. Construction proceeds around the clock, which keeps work, deliveries and commuting at a steady rate rather than concentrating them at a morning and evening peak; authorization for 24-hour construction and construction lighting is requested in Appendix I.

6. Other operations notes

After construction, the halls are lightly occupied. Access is badge-restricted. Staff on the floor are technicians doing maintenance or replacing failed equipment, not a standing workforce in every aisle. Life-safety systems follow the scheme in the fire-protection narrative: wet-pipe sprinklers and a voice and strobe fire alarm in the core and shell of each building; clean-agent gas suppression with pre-action sprinklers, ceiling and underfloor spot detection and aspirating smoke detection above each rack row in every computing hall, with hand-held clean-agent extinguishers; and pre-action sprinklers with detection in the electrical buildings. Rated egress will be set with the building permit. Dead-end aisles and travel distance will be resolved with the fire-code official, including any maintenance-only designation if needed.

On-site operations include water-chemistry monitoring for the cooling loops, mechanical upkeep of dry coolers and in-row units, medium-voltage switching, and supervision of the battery yard. The campus will be staffed twenty-four hours. Security can meet arriving apparatus and provide a site map of halls, tanks, batteries, transformers, and shutoffs. A hazardous-materials inventory for batteries and treatment chemicals will be filed with the County and the Local Emergency Planning Committee before occupancy. This Special Use Authorization covers both properties; it does not approve off-site utility work. Equipment counts, pipe sizes, and nameplate ratings are building-permit items and will be sized to the halls then proposed.

7. Noise

The primary sound sources on the campus are the outdoor dry-cooler fans and the transformers. The dry coolers are about 38 feet tall with fans roughly 16 feet in diameter; they move large volumes of air slowly, which is quiet, and they sit more than a thousand feet from U.S. Highway 191. For comparison, the Apache Generating Station's cooling towers stand within a few hundred feet of the highway. Dry coolers use large, slow-turning fans selected for low sound, on the order of 250 revolutions per minute, rather than small high-speed fans. Cooler arrays are located toward the interior of the campus, away from Highway 191 and from adjoining property lines, with buildings and equipment yards between the coolers and the perimeter. Fan speed follows cooling load and outdoor temperature, so fans run at reduced speed at night and in cooler months, when sound carries farthest. Standby generators are housed in sound-attenuated enclosures and run only during utility outages and routine testing. The applicant will design to a property-line sound level consistent with the surrounding rural industrial area, which includes the adjoining generating station and highway, and will confirm it with a noise study at building permit; where practical, cooler arrays will be oriented so that buildings stand between them and the highway and the nearest residences.

8. Employees, initial and future

Initial employment is a construction workforce in the thousands during the first-phase build (Section 10), then a 24-hour operations, security, and facilities crew of roughly 250 people, including on-site contractors, as the Phase 1 buildings are commissioned. Construction headcount is temporary and leaves the site when that phase is done.

Future employment grows as later phases come online, to roughly 500 to 600 people across all shifts at full build-out of the AEPCO property and on the order of 1,000 people across all shifts at full build-out of both properties: mechanical and electrical technicians, automation and controls staff, engineers, supervisors, site leadership and security, counting the applicant's staff and the on-site contractors for security, janitorial and maintenance work. The operating campus remains a low-occupancy industrial facility: technicians, security, and a limited day staff, not an office campus or a shift-change plant. Exact headcount by phase will be confirmed with building-permit plans. There is no housing on the site.

9. Legal access

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Legal access is from U.S. Highway 191, a public highway, by all-weather driveway connections subject to ADOT approval. Driveway geometry and any Arizona Department of Transportation encroachment permit are a separate review and will be obtained before the connections are built.

Roads inside the fence are private campus roads. Tombstone Resources L.L.C. will own and maintain them. There is no public dedication of the interior loop and no homeowners' association. If a shared driveway or easement with an adjoining utility parcel is required, we will put a written maintenance agreement in place before a building permit is issued for that access. Gates, Knox access, and fire-apparatus dimensions are described in the fire-protection narrative.

10. Traffic plan

Traffic on Highway 191 will be highest during construction and lower once the campus is in operation. Construction traffic is workforce vehicles and trucks delivering buildings or equipment, aggregate, and construction materials. Deliveries will use the Highway 191 driveways and stay on the private campus roads. Construction may proceed around the clock to meet the schedule. Construction employment is in the thousands while a phase is built, on the order of 5,500 at peak. The applicant or its contractors will operate a worker shuttle, with on-site and off-site parking: construction workers park at off-site park-and-ride lots along the U.S. 191 and Interstate 10 corridors and ride buses to the campus, with shift starts staggered across the 24-hour schedule, and private vehicles on the campus are limited to supervisors, specialty crews with tools and equipment, and permitted workers. On that basis, peak construction traffic at the campus driveways is on the order of 80 buses, 1,000 to 1,300 passenger vehicles and 150 to 250 trucks per day, each entering and leaving once, spread across all hours; the busiest period is the weekday day-shift start, on the order of 300 to 400 vehicles and buses in the peak hour. Without the shuttle, the same workforce would put roughly three times as many passenger vehicles on Highway 191, which is why the shuttle is part of the plan from the first phase. A traffic impact analysis will be prepared for ADOT, which controls the Highway 191 driveways, and turn, acceleration and deceleration lanes will be built as ADOT requires. A construction traffic management plan covering all hours, including flagging, will be provided with the building permit.

Operating traffic is modest: on the order of 150 to 200 passenger vehicles and five to ten trucks per day for the 24-hour operations, security and maintenance crew, occasional specialty contractors, and equipment deliveries, rising to on the order of 600 to 700 passenger vehicles per day at full build-out of both properties, with an operating staff on the order of 1,000 across all shifts, spread across all hours. Construction traffic is described in the preceding paragraph. There is no public visitor use, no retail, and no concentrated shift change; staff and contractors arrive and leave across all hours, so the campus does not load Highway 191 the way a plant with a single shift change would. Future phases add some construction traffic while that phase is built, then return to the same low operating pattern. Because construction runs around the clock with staggered shifts and the worker shuttle, construction traffic is spread across all hours rather than concentrated at a morning and evening peak, and parking is managed on site. The traffic impact analysis for ADOT covers both construction and operation.

11. Decommissioning

If the campus or a phase of it is permanently taken out of service, the applicant will remove computing equipment, batteries, transformers and stored chemicals through licensed recyclers and haulers, drain and dispose of cooling-loop fluids properly, and either re-let the buildings for a use approved by the County or remove them and restore the land to a safe, stable condition suitable for the uses allowed in the district, within a period agreed in the Development Agreement. This commitment applies to the buildings, the equipment yards and the property as a whole, not only to the batteries. If the campus no longer has a purpose under an approved use, it will be decommissioned. Underground utilities will be abandoned or removed per County standards. A battery energy-storage decommissioning plan (removal, recycling and site restoration) will be provided.

12. Lighting

During operations, site lighting is minimized: fixtures are off or dimmed except where work or security requires. Active fixtures are fully shielded, warm-spectrum, directed downward, and compliant with the Cochise County outdoor lighting code, with motion or occupancy control in equipment yards and no uplighting. Dry coolers and other outdoor equipment carry no lighting requirement of their own; night maintenance uses portable task lighting. Construction lighting is

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addressed in Appendix I: the lighting code's temporary construction allowance is limited in duration, and each construction phase runs around the clock for one to two years, so the applicant requests authorization for shielded, downward-directed construction lighting for the duration of each phase.

13. Stormwater and dust control

The applicant will meet the Cochise County Floodplain Regulations and Stormwater Ordinance. A drainage analysis certified by an Arizona registered professional civil engineer, with grading plans and a drainage report, will be submitted before construction begins, and a Floodplain Use Permit will be obtained for any disturbance within a regulatory floodplain or erosion-hazard area. Existing washes shown on the concept plan will be conveyed through or around the campus; finished floors will be set at least one foot above the determined water surface elevation; retention or detention will hold post-development discharge at or below pre-development rates with no adverse impact to adjacent parcels or roads, and basins will drain within 24 hours and be fitted with wildlife escape ramps. Perimeter fencing in flood-prone areas will not obstruct flow. During construction, dust will be controlled under an ADEQ dust-control permit and an AZPDES construction general permit with a stormwater pollution prevention plan, using watering, phased disturbance, a polymer soil stabilizer such as Soilworks Gorilla-Snot on disturbed areas and haul roads, stabilized entrances, and revegetation of areas not built.

14. Wildlife and habitat

The property lies near the Willcox Playa, a recognized wintering area for sandhill cranes and an Important Bird Area, within the Sky Islands region. The applicant has designed the campus with that setting in mind. The design will be shared with the Arizona Game and Fish Department and the U.S. Fish and Wildlife Service, and their recommendations will be considered in final design. A biological and special-status species assessment of the property will be completed by a qualified consultant before ground disturbance.

Design measures include: dry cooling with no cooling towers, ornamental ponds, or open process water that would attract birds; low metal buildings with minimal glazing, and bird-safe glazing where glass is used; permanent exterior lighting that is fully shielded, warm-spectrum, and downward-directed, with motion control in the yards and no uplighting, consistent with County lighting standards; bird flight diverters on any new applicant-controlled overhead line within the campus; stormwater basins designed to drain within 24 hours and fitted with wildlife escape ramps; and wildlife-friendly fencing with a visible top rail and no barbed wire, reviewed with Arizona Game and Fish. Security fencing is placed around the building and equipment pads and along those sections of the property line where security requires it; elsewhere the perimeter uses less restrictive, wildlife-friendly fencing so that wildlife can continue to move across the property; the substation and electrical yards receive wildlife-exclusion fencing. Fencing will be shown on the site plan. A vegetation buffer will be provided at the perimeter where it does not conflict with security clear zones or defensible space. The utility-owned substation and off-site transmission are outside the applicant's control and are subject to separate review.

The applicant will establish pre-construction environmental baselines and monitor them through construction; any operational monitoring, and the sharing of results with the County and the agencies, will be as provided in the Development Agreement.

15. Security

Security is layered: controlled gates at the U.S. 191 driveways, fencing around the building and equipment pads, cameras, and 24-hour on-site security staff. Security fencing is used at the building and equipment pads and along those sections of the property line where security requires it; the rest of the perimeter is the wildlife-friendly fencing described in Section 14. Security measures may be strengthened over time as the use of the facility warrants, within the fencing and lighting standards of the code.

Sincerely,

Michael Smith
Authorized Representative
Tombstone Resources L.L.C.

Appendix F

Water Narrative (Water Use Plan)

Section 2.51.040.3.e and 2.51.040.5.j. Figures are stated for the whole campus on both properties, with the AEPCO property's share noted.

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October 30, 2026

Cochise County Development Services
Attn: Christine McLachlan, AICP, Director
1415 W. Melody Lane, Building F
Bisbee, Arizona 85603

Re: Special Use Authorization. Water Narrative
Conventional building data-center layout, dry-cooled
Data center campus, approximately 747 acres on two properties, Rural zoning
Unincorporated Cochise County, Arizona

Director McLachlan:

This letter accompanies the Special Use Authorization application for a data-center campus on approximately 747 acres zoned Rural, on two properties along U.S. Highway 191 near Cochise, each adjoining Arizona Electric Power Cooperative's Apache Generating Station lands: approximately 400 acres owned by AEPCO and approximately 348 acres owned by Southline Transmission. One Special Use Authorization is requested for both properties. It describes water use for the building layout. The campus takes electric service from the grid; the natural-gas standby generators for critical loads are air-cooled, so there is no process water for power generation. The campus is designed as a dry-cooled facility. It does not use evaporative spray in normal operation. Full build-out is up to nine computing buildings, approximately 6 gigawatts (6,000 megawatts), in four phases: five buildings on the AEPCO property and four on the Southline Transmission property. This narrative states the figures for the whole campus, with the AEPCO property's share noted, so the Commission can see the water picture for the entire authorization and not only the first phase.

1. How the campus is cooled and why it uses very little water

Heat from the computing equipment is carried by a closed liquid loop to outdoor dry coolers. A dry cooler is a finned-tube heat exchanger with fans. Air passes over the tubes and carries the heat away. The water stays inside the pipe. Nothing is evaporated to the atmosphere in normal operation. It is the same principle as a car radiator, at industrial scale.

On the hottest afternoons of the year, outdoor air is too warm for the coolers to hold the design loop temperature. Many data centers spray water on the cooler coils during those hours to pre-cool the air. This campus does not. The loop temperature is allowed to rise a few degrees and the computing equipment runs slightly warmer for those hours. The applicant's climate analysis uses the published hourly temperature record for the Cochise area at the site elevation. At full computing load, the loop is above its design temperature for about 180 hours a year, about 2 percent of the time, and reaches the equipment's upper operating limit for roughly one to two hours a year. At normal operating load it does not reach that limit. The dry desert air and cool nights here make this approach work better than it does at a humid coastal site. That design choice is what removes cooling water from the campus.

Cooling-related water consumption is therefore limited to closed-loop makeup: replacing small losses from valve maintenance, sampling, and chemistry adjustment. That is a maintenance quantity, not a process demand. There are no cooling towers, ornamental ponds, or open process water anywhere on the campus, and stormwater basins drain within 24 hours, so the campus adds no standing water that would attract birds near the Willcox Playa. Any water drained from a loop for maintenance is contained and hauled off site for disposal under ADEQ, federal and County standards, as described in the Operations Narrative; nothing is discharged to the ground.

The closed loops are filled once, when each building is commissioned. That initial fill is a one-time quantity: as a planning estimate, several hundred thousand gallons per building across the dry-cooler loop (inhibited water) and the rack cooling loop (a glycol-water mix), or roughly 3 to 6 million gallons (about 10 to 18 acre-feet) for the whole campus over the multi-year build-out, to be confirmed from the mechanical design at building permit. It will come from the same non-potable sources as the fire reserve and construction water: treated wastewater from the adjoining generating station that would otherwise go to its evaporation ponds, or trucked water. The fill therefore requires no new pumping

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from the Willcox basin aquifer.

2. Average demand

Cooling water at full build-out is limited to closed-loop makeup across the campus. There is no evaporative use in normal operation. If the applicant elects to keep a small spray capability in reserve for the one or two hottest hours of the year, the Cochise climate record shows that would amount to roughly fifty thousand gallons per year for each 240 megawatts, or on the order of one million gallons per year, about 4 acre-feet, across the approximately 6,000-megawatt campus on both properties (about 55 percent of that on the AEPCO property). The base design does not use it. A conventional cooling-tower data center of similar size would consume thousands of acre-feet per year.

The remaining demand is ordinary site water: restroom and break-area fixtures for the 24-hour operations, security and maintenance crew, fire-system testing and a fire reserve, and construction and dust control during each phase. Domestic use at full build-out is on the order of 6,000 to 8,000 gallons per day for an operating staff on the order of 1,000 across all shifts (Operations Narrative, Section 8), based on typical domestic uses within a data center campus. Construction water is temporary and is counted with each phase; sanitation for the construction workforce is by portable facilities serviced off site, and its drinking water is trucked in.

3. Peak demand

Because there is no evaporative spray, the campus has no hot-weather cooling peak. The dry coolers respond to heat with fan speed and loop temperature, not with water. Peak water draw is driven by fire-pump testing or a fire event, and by construction. Those are infrequent and are served from on-site storage so that a peak hour does not require a matching instantaneous draw from the source. A peak day of operational draw from the source at full build-out of both properties is on the order of 15,000 to 20,000 gallons (domestic at its daily maximum plus loop makeup), about 10,000 gallons of which is the AEPCO property; refilling the fire reserve after a test or incident is spread over several days from storage. Peak flow and tank volume are building-permit items, sized to each phase as proposed.

4. Annual use

Annual operational water at full build-out of the campus on both properties, approximately 6 gigawatts (6,000 megawatts), is estimated as follows; the AEPCO property's five buildings are about 55 percent of each figure. Cooling: closed-loop makeup on the order of a hundred thousand gallons per year, well under one acre-foot, with up to about 4 acre-feet in reserve only if a hot-hour spray capability is retained. Domestic and sanitary: on the order of 2 to 3 million gallons per year, about 7 to 9 acre-feet, for the operating staff described in the Operations Narrative. Fire-system testing: a fraction of an acre-foot. Total operational use at full build-out is on the order of 7 to 10 acre-feet per year, roughly the annual water use of 20 to 30 typical Arizona single-family homes at about one-third of an acre-foot per home per year. Earlier phases are proportionally less; a first phase of approximately 1,500 megawatts is roughly one-quarter of those figures. These are planning estimates.

For scale: a typical full-circle center-pivot irrigation system in the Willcox basin waters about 120 to 125 acres of a 160-acre quarter section and applies on the order of 400 to 600 acre-feet of water per year, depending on the crop. The entire campus at full build-out, on about six times that land area, uses roughly two percent of the water of a single pivot. At 7 to 10 acre-feet per year, the campus is not a measurable contribution to groundwater decline or to the land subsidence and earth fissures that have occurred in parts of the basin. The applicant will not use groundwater for industrial cooling or process purposes, and any potable supply will follow Willcox Active Management Area and County rules for commercial users.

5. Source

At these volumes the campus does not need a dedicated industrial water supply for cooling. The planned source for domestic water is a small on-site potable system or trucked potable water, sized for the crew. The planned source for fire reserve and construction water is non-potable supply, with treated industrial process water from the adjoining Apache Generating Station as the preferred option where the cooperative can make it available, and trucked non-potable water as a backup. Apache Generating Station sends on the order of 700 acre-feet per year of wastewater streams to its evaporation ponds; intercepting and treating a small part of that stream, as industrial wastewater reuse, is the planned non-potable source. The station's groundwater is held under Type 2 rights in the Willcox Active

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Management Area and cannot be re-purposed for the campus, which is why the plan relies on wastewater reuse and not on plant wells. The campus will not rely on a new production well in the Willcox Active Management Area for cooling, and has no cooling demand that would require one.

6. Conservation

Conservation is the design. Dry cooling with a floating loop temperature eliminates evaporative cooling water, which is the dominant water use at conventional data centers. Closed loops are treated and recirculated. Occupancy is low, so domestic use is small. Landscape, if any, will be native and unirrigated after establishment. Construction water will be managed for dust control without wasteful discharge. Later phases are designed to the same dry-cooling standard.

7. Non-potable and reclaimed feasibility

Zoning Regulations Section 2.51.040 provides that potable water is not to be used for routine cooling or humidification unless the plan shows that non-potable or reclaimed water is not reasonably available. This campus has no routine cooling or humidification water use to which that rule applies. The small amount of closed-loop makeup is chemically treated water and does not need to be potable. Fire reserve and construction water will be non-potable. Potable water on the campus is limited to drinking and sanitary use for the crew. Non-potable water from the adjoining generating station is reasonably available for the non-potable needs the campus does have, and reclaimed municipal wastewater is not a nearby public system this Rural site can tap today.

Sincerely,

Michael Smith
Authorized Representative
Tombstone Resources L.L.C.

Appendix G

Fire Protection and Emergency Response Narrative

Section 2.51.040.3.f. Response providers, emergency access, fire-water supply (dedicated tank, redundant fire pumps, private hydrant loop), battery yards, and building detection and suppression scheme. The same concept applies on both properties.

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October 30, 2026

Cochise County Development Services
Attn: Christine McLachlan, AICP, Director
1415 W. Melody Lane, Building F
Bisbee, Arizona 85603

Re: Special Use Authorization. Fire Protection and Emergency Response Narrative
Data center campus, approximately 747 acres on two properties, Rural zoning
Unincorporated Cochise County, Arizona

Director McLachlan:

This letter accompanies the Special Use Authorization application for a data-center campus on approximately 747 acres zoned Rural, on two properties along U.S. Highway 191 near Cochise, each adjoining Arizona Electric Power Cooperative's Apache Generating Station lands: approximately 400 acres owned by AEPCO and approximately 348 acres owned by Southline Transmission. It is submitted under Zoning Regulations Section 2.51.040.3.f. One Special Use Authorization is requested for both properties. The campus takes electric service from the grid; standby generation is limited to natural-gas units for critical loads. Engineered fire-protection drawings will be locked at building permit. This narrative states the concept the concept plan will show, for the full build-out of up to nine computing buildings in four phases: five on the AEPCO property and four on the Southline Transmission property. The same fire-protection concept applies across the campus.

1. Who responds, and how long

The site is unincorporated and is not within an established fire district or municipal fire-protection service area. Zoning Regulations Section 2.51.040.3.f therefore requires this narrative. The campus is designed on that basis.

The nearest organized stations, pending a measured drive from the final access points, are:

Sunsites-Pearce Fire District Station 2, 6 E. Havasu Way, Cochise. Estimated 10 to 15 minutes once dispatched.

Willcox Fire-Rescue, Public Safety Complex, 320 W. Rex Allen Drive, Willcox. Estimated 15 to 25 minutes once dispatched. Willcox covers the city; response outside city limits is not a statutory duty and is offered by subscription or as the department elects.

Sunsites-Pearce Fire District Station 1, 105 N. Tracy Road, Pearce, is farther south and is a second-due resource.

Calls go through 911 and Southeast Arizona Communications. The Arizona Department of Forestry and Fire Management handles wildland fire on and around the site. The Cochise County Sheriff's Office is the law-enforcement first responder. The County Local Emergency Planning Committee is the hazardous-materials coordination point.

The applicant will request a subscription or automatic-aid agreement with the nearest willing department before a building permit is issued, and, if an agreement is made with a district, will pay that district's assessments. The applicant is prepared to partner with a district that wishes to serve the site, on terms set in the Development Agreement, including training, apparatus and equipment, and otherwise will maintain trained on-site emergency response staff and equipment, as the applicant's affiliates do at their other facilities. The applicant will meet with the County Local Emergency Planning Committee, together with AEPCO, before construction. On-site systems are the primary protection. Off-site arrival is support, not the design basis.

2. Emergency access

Campus roads will be built to International Fire Code apparatus standards and shown on the concept plan. Typical dimensions, to be confirmed with the fire-code official at building permit:

All-weather driveway connections to U.S. Highway 191 on each property, subject to ADOT approval. Driveway geometry and any ADOT encroachment permit are a separate review.

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Unobstructed width of 26 feet on the campus loop where private hydrants sit; 20 feet minimum elsewhere. Vertical clearance 13 feet 6 inches. All-weather surface rated for 75,000-pound apparatus. Grade at or under 10 percent.

Inside turning radius of 28 feet and outside radius of 48 feet at campus intersections. Dead-end roads longer than 150 feet get a 120-foot hammerhead, a 60-foot Y, or a 96-foot-diameter cul-de-sac. Apparatus reach to within 150 feet of every first-story exterior wall.

Perimeter fence with controlled gates at each Highway 191 entrance and at interior yard gates. Gates take a Knox box or equivalent, fail to a manual override on power loss, and can be opened by on-site security. Address and hydrant markings will meet County and fire-code standards. Emergency access will be kept open during construction.

3. Fire water

There is no municipal hydrant grid on these Rural parcels. Fire water will be on-site.

A dedicated fire-water tank, separate from any operational draw, will be the fire-protection water supply. The tank will be filled from a non-potable source; treated industrial process water from the adjoining Apache Generating Station is the preferred option where the cooperative can make it available. Because the campus is dry-cooled and has no cooling-tower or spray water demand, the fire reserve is the largest on-site water volume, and the tank is sized for fire duration rather than for process makeup. Redundant fire pumps, each able to carry the design demand alone, will feed a private looped hydrant main around each phase, with a fire-department connection at each building. Hydrant spacing and residual pressure will be set with the fire-code official against the adopted fire code and NFPA 13; hydrant spacing at the battery yards will follow the battery system's listing and large-scale fire test data.

Tank volume, pump sizes, and hydrant count are building-permit items. They will be sized phase by phase, with the Phase 1 system sized to the Phase 1 buildings, and extended across both properties as later phases are built. Fire and domestic water will not depend on a new Willcox Active Management Area production well.

4. Electrical equipment, batteries, and other hazards

Standby generation is limited to approximately 10 megawatts of natural-gas-fired generators per computing building for critical services only, supplied by pipeline; the generators are housed in enclosures in the equipment yards; incidental fuels are kept below the quantities that require a fire-code operational permit. If pipeline gas is not yet available when a building opens, a temporary natural-gas supply (compressed or liquefied) permitted under the fire code may serve the generators until pipeline service is in place. The principal hazards on the campus are electrical and chemical. These sit in screened equipment yards on the concept plan, set back from buildings, from U.S. 191, and from adjoining Rural parcels:

Battery energy-storage containers for ride-through on loss of utility power, in dedicated yards, spaced to NFPA 855 and to the product listing and its large-scale fire test data. The containers are listed units whose detection, gas monitoring, thermal management and electrical isolation are built into the product, and their battery-management-system signals are monitored around the clock by the on-site controls team. Fire protection for the battery yards is private hydrants, spaced per the listing and fire testing, for exposure protection of surrounding equipment. No fixed suppression system is proposed on the containers; that is consistent with the listing and with industry guidance for lithium-ion storage, which is to let an involved unit burn out under controlled conditions while protecting exposures with hydrant water. Supplemental ultraviolet/infrared flame detection in the yards can be added if the fire-code official requests it. Trained on-site staff will have the equipment and procedures to respond to a battery incident, and a battery decommissioning plan will be provided. Transformer yards with mineral-oil containment. Medium-voltage switchgear in electrical buildings. Uninterruptible-power batteries inside network rooms.

Natural-gas standby generators at each computing building and the operations building, tested on a routine schedule.

Water-treatment chemicals for the closed cooling loops, in labeled, contained storage at the mechanical yard. Glycol-water coolant inside the cooling loops. Small quantities of maintenance oils and solvents in the operations building.

A site hazardous-materials inventory will be filed with the County and the Local Emergency Planning Committee before occupancy. Battery and transformer yards will be reachable from the campus loop without driving through a building.

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5. Detection and suppression

Fire protection inside the buildings is a defined scheme, to be detailed at building permit:

Core and shell of each computing building: wet-pipe sprinklers throughout, and a fire alarm system with speaker (voice) and strobe notification.

Each computing hall: clean-agent gas suppression plus pre-action sprinklers; spot smoke detection at the ceiling and below the floor where an underfloor space is used; supplemental aspirating (very-early-warning) smoke detection directly above each row of racks; and hand-held clean-agent extinguishers throughout.

Electrical buildings: pre-action sprinklers with detection.

Battery yards: private hydrants spaced per the listing and fire testing, with the detection and safety features built into the listed containers and monitored around the clock, as described in Section 4; no fixed suppression on the containers. Outdoor cooling equipment is finned-tube heat exchangers with electric fans and carries no fuel. A grassland buffer at the fence will be maintained for wildland separation.

The campus will be staffed 24 hours. Security can meet arriving apparatus and provide a site map of buildings, tanks, batteries, transformers, and shutoffs. This Special Use Authorization covers both properties; it does not approve off-site utility work.

Sincerely,

Michael Smith
Authorized Representative
Tombstone Resources L.L.C.

Appendix H

Hazardous or Polluting Materials Attachment (Supplemental Question 22)

Inventory, handling, containment, waste and reporting for the build-out of up to nine buildings on both properties.

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Special Use Authorization Application — Hazardous or Polluting Materials Attachment

Supplemental Question 22 | Cochise Supercomputer Campus – AEPCO and Southline Transmission properties | Applicant: Tombstone Resources L.L.C. | Property owners: Arizona Electric Power Cooperative, Inc. and Southline Transmission

Approximately 747 acres on two properties, RU-4, U.S. Highway 191, Cochise, Arizona | Draft for transfer to the County's attachment form | October 2026

1. Summary

The campus is a grid-served, dry-cooled data center on two properties covered by one Special Use Authorization. It has no cooling towers and no manufacturing or chemical process. Standby generators are natural-gas-fired from pipeline supply, and serve critical services only. The hazardous or polluting materials on the site are therefore limited to: (a) lithium-ion battery energy storage and UPS batteries; (b) insulating mineral oil in transformers; (c) glycol-water coolant and water-treatment chemicals in closed cooling loops; (d) lubricating oil and coolant in the standby generators; (e) clean-agent fire-suppression cylinders in the computing halls and hand-held clean-agent extinguishers; and (f) small maintenance quantities of lubricants, solvents, paints and cleaners. No pesticides, fertilizers, compressed toxic gases, explosives, or bulk flammable liquids are used or stored. Quantities below are planning-level maxima for the build-out of up to nine buildings on both properties and will be finalized in the Hazardous Materials Inventory Statement at building permit.

2. Inventory of materials

Material / substance	Where used	Form and storage	Planning maximum on site (full build-out)	Location (concept plan)	Containment and safeguards	Regulatory status
Lithium-ion battery energy storage (BESS)	Ride-through on loss of utility power	Factory-sealed, UL 9540-listed outdoor containers; no free electrolyte handling on site	Capacity sized at building permit; containerized units in dedicated yards	Screened BESS yards, interior of campus, set back from buildings, U.S. 191 and adjoining parcels	NFPA 855 spacing and separation per the product listing and UL 9540A large-scale fire test data; detection, gas monitoring, thermal management and electrical isolation built into the listed containers, with battery-management-system signals monitored 24/7 by the on-site controls team; private hydrants spaced per the listing and fire testing for exposure protection (no fixed suppression on the containers, consistent with the listing and industry guidance); supplemental UV/IR flame detection if the fire-code official requests it; trained on-site staff with response equipment and procedures; decommissioning plan	IFC Ch. 12 / NFPA 855; fire-code operational permit; EPCRA Tier II reporting if thresholds met
UPS batteries (network rooms)	Short-duration hold-up for network equipment	Lithium-ion or VRLA cabinets inside electrical rooms	Several hundred kWh per building	Inside each computing building's network core and operations building	Rated rooms, detection, ventilation per code; spill trays for VRLA; manufacturer take-back	IFC Ch. 12; Tier II if thresholds met
Insulating mineral oil (transformers)	Medium-voltage transformers owned by applicant (the main substation is utility-owned)	Sealed transformer tanks; small drum stock for maintenance	Tens of thousands of gallons campus-wide in sealed equipment (several hundred to ~2,000 gal per pad-mount unit)	Transformer yards adjacent to each building on both properties; utility substation at the southwest corner of the AEPCO property	Secondary containment sized to the largest unit plus rainfall (IEEE 980); SPCC Plan (aggregate oil > 1,320 gal); oil-water separator or contained sump; non-PCB oil only	40 CFR 112 SPCC; EPCRA Tier II; fire code

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Material / substance	Where used	Form and storage	Planning maximum on site (full build-out)	Location (concept plan)	Containment and safeguards	Regulatory status
Glycol-water coolant (propylene glycol ~25%)	Closed rack-cooling loops from the racks to the coolant distribution units	In closed, pressurized piping; make-up totes in mechanical rooms	On the order of 100,000 to 200,000 gal per building in piping and equipment (planning estimate, to be confirmed from the mechanical design); make-up stock ≤ ~1,000 gal	Inside buildings; make-up at mechanical rooms	Closed loop with leak detection; drip containment at pumps and totes; recovered and recycled, not discharged	Low toxicity (propylene glycol); Tier II if thresholds met
Inhibited cooling water (dry-cooler loop)	Closed facility-water loop from the coolant distribution units to the dry coolers	In closed, pressurized piping and dry-cooler tube bundles; corrosion inhibitor dosed from totes	On the order of 250,000 to 475,000 gal per building (planning estimate, to be confirmed from the mechanical design); one-time fill from non-potable sources	Dry-cooler yards and mechanical rooms	Closed loop with leak detection; contained drain points; drained water contained and hauled off site, not discharged	Treated water; inhibitor products per SDS (see water-treatment chemicals row)
Water-treatment chemicals (corrosion inhibitor, biocide, pH control)	Closed cooling loops	Vendor totes and drums (≤ 330 gal) in chemical storage rooms	≤ ~1,500 gal total per building	Mechanical/chemical rooms at each building	Containment pallets or curbed room; segregated incompatibles; eyewash; SDS on site; vendor-managed deliveries	IFC Ch. 50 MAQs; Tier II if thresholds met
Natural gas (pipeline)	Standby generators, ~10 MW per building, critical loads only	Pipeline supply; no permanent on-site storage (a temporary code-permitted CNG or LNG supply may precede pipeline service)	None stored permanently	Metered service to each generator enclosure	Utility-owned meter and regulators; seismic/excess-flow shutoff; NFPA 37/54 clearances	Utility tariff; fire code; ADEQ air permitting for engines as applicable
Generator lubricating oil and engine coolant	Standby generators	In engine sumps and radiators; drum stock for service	A few hundred gallons per building	Generator enclosures and maintenance storage	Enclosure drip containment; spill kits; used oil recycled	SPCC (counts toward oil aggregate); used-oil rules
Clean-agent fire suppression (e.g., FK-5-1-12 or inert gas) and hand-held clean-agent extinguishers	Computing halls (gas suppression with pre-action sprinklers); portable extinguishers throughout the buildings	Pressurized cylinders in protected rooms; portable extinguishers at code-required locations	Per NFPA 2001 and NFPA 10 design at building permit	Inside computing buildings	Listed systems; cylinder restraint; no ozone-depleting agents	NFPA 2001; fire code
Maintenance supplies (lubricants, solvents, paints, cleaners, aerosols)	Facility maintenance	Original containers in flammable-liquid cabinets	≤ fire-code maximum allowable quantities; total < ~200 gal campus-wide	Operations/maintenance building	Flammable cabinets; secondary containment; SDS; spill kits	IFC Ch. 50/57 MAQs
Incidental fuel (gasoline/diesel for maintenance equipment)	Grounds and maintenance equipment	Approved portable containers	Below fire-code operational-permit quantities	Operations/maintenance building	Flammable cabinet; no fixed tanks	IFC 105.6 thresholds
Refrigerant (packaged HVAC for offices and electrical rooms)	Comfort cooling of occupied/electrical spaces	Sealed in packaged equipment	Small; equipment charge only	Rooftop/pad units at operations and electrical buildings	Factory-sealed; EPA 608 technicians	EPA 40 CFR 82

3. Materials not present on the site

- No cooling-tower or evaporative-cooling chemicals (the campus is dry-cooled).
- No manufacturing, plating, etching or other industrial process chemicals.
- No bulk storage of pesticides, herbicides or fertilizers; native, unirrigated landscape, with weed control for fire breaks by a licensed contractor.

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- No compressed toxic or flammable gases other than pipeline natural gas in utility piping; no explosives; no radioactive sources.
- No PCB-containing equipment.

4. Transport, delivery and handling

Materials arrive by licensed carriers on U.S. Highway 191 through the campus driveways in DOT-compliant packaging. Battery containers and transformers arrive factory-sealed and are set by crane; glycol and treatment chemicals arrive in totes or by vendor tanker and are transferred by closed connections inside curbed areas; maintenance supplies arrive in original containers. Deliveries are received by trained staff, logged, and stored only in the designated locations shown on the concept plan. Safety Data Sheets are kept on site and available to responders. Hazardous-materials handling training is provided to operations staff, and a site hazardous-materials map is kept at the security building for arriving apparatus.

5. Spill prevention, containment and response

- Secondary containment for all transformers and oil-filled equipment sized to the largest unit plus 24-hour rainfall; oil-water separators or sealed sumps on contained drainage.
- A Spill Prevention, Control and Countermeasure (SPCC) Plan under 40 CFR 112, because aggregate oil in transformers and generators will exceed 1,320 gallons.
- Curbed chemical rooms, containment pallets and spill kits at every storage and transfer point; eyewash stations in chemical rooms.
- Closed cooling loops with leak detection; drained fluids recovered to containers for recycling, not discharged to ground or stormwater.
- Stormwater retention basins and BMPs under the AZPDES permit and the Cochise County Stormwater Ordinance; no hazardous materials stored in a regulatory floodplain.
- Trained on-site staff respond to incipient spills with equipment on hand, and to a battery incident by isolating the unit, protecting exposures with hydrant water and letting the involved unit burn out under controlled conditions, consistent with the listing and industry guidance; larger releases are reported to ADEQ, the National Response Center as required, the Cochise County LEPC, and the responding fire agency under a written emergency response plan.

6. Waste generation and disposal

Routine wastes are small: used lubricating oil (recycled through a licensed used-oil handler), spent glycol (reclaimed or recycled), empty chemical containers (returned to vendor or triple-rinsed and recycled), universal wastes such as lamps and small batteries (licensed recycler), and spent lithium-ion modules at end of life (manufacturer take-back or licensed battery recycler). The campus is expected to operate as a very-small- or small-quantity generator under ADEQ hazardous-waste rules; any hazardous waste is manifested to a permitted facility. Domestic wastewater goes to the on-site treatment systems shown on the plan; no process wastewater is generated.

7. Permits, plans and reporting

- Hazardous Materials Inventory Statement and Hazardous Materials Management Plan per International Fire Code Chapter 50, submitted at building permit.
- Fire-code operational permits for battery energy storage, hazardous materials and flammable/combustible liquids as applicable; NFPA 855 compliance documentation for BESS.
- EPCRA Sections 311/312 Tier II reporting to the Arizona Emergency Response Commission, the Cochise County LEPC and the fire agency for any material above reporting thresholds (transformer oil, glycol, batteries, treatment chemicals).
- SPCC Plan (40 CFR 112) certified by a professional engineer before oil-filled equipment is energized.
- ADEQ air-quality permit or registration for the natural-gas standby engines, as applicable.

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- AZPDES Construction General Permit and post-construction stormwater BMPs; ADEQ on-site wastewater permits.
- Site hazardous-materials inventory filed with the County and the LEPC before occupancy, as committed in the Fire Protection and Emergency Response Narrative.

Prepared from the Operations, Water and Fire Protection narratives submitted with this application. Quantities are planning estimates for the Special Use Authorization covering both properties and will be finalized at building permit.

Appendix I

Request for Modification of Development Standards (building height, site coverage, and 24-hour construction)

Section 2.51.040.5.a height modification to 40 feet for computing buildings and outdoor mechanical equipment, site-coverage modification to 50 percent, and 24-hour construction with construction lighting, for the campus on both properties.

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October 30, 2026

Cochise County Development Services
Attn: Christine McLachlan, AICP, Director
1415 W. Melody Lane, Building F
Bisbee, Arizona 85603

Re: Special Use Authorization — Request for Modification of Development Standards
Building height and site coverage, Rural (RU-4) district
Data center campus, approximately 747 acres on two properties, U.S. Highway 191, Cochise, Arizona
Applicant: Tombstone Resources L.L.C. | Property owners: Arizona Electric Power Cooperative, Inc. (approx. 400 acres) and Southline Transmission (approx. 348 acres)

Director McLachlan:

With its Special Use Authorization application, Tombstone Resources L.L.C. requests that the Planning and Zoning Commission approve three modifications of the Rural district development standards for the data center campus described in the application, on both the AEPCO property and the Southline Transmission property covered by this single Special Use Authorization: (1) building height, under Zoning Regulations Section 2.51.040.5.a, and (2) site coverage. If the County determines that relief from the site coverage standard must be processed as a variance through the Board of Adjustment rather than as a modification within the Special Use Authorization, the applicant asks that this letter be treated as that request and will supply any additional form and fee the County requires. The applicant will follow all applicable County drainage criteria to address the additional lot coverage, as described in Section 4 below.

1. Building height

The computing buildings are single-story pre-engineered metal buildings with a roof height of 38 feet 8 inches. The Rural district limit is 30 feet. Section 2.51.040.5.a allows the Special Use Authorization to modify the height limit; the applicant requests that computing buildings and outdoor mechanical equipment, including the dry coolers and tanks, on both properties be permitted up to 40 feet. The substation is owned by the serving utility and is exempt from the height limit; the applicant's electrical equipment is below 30 feet, and the dry coolers stand about 38 feet. The additional height is a function of the computing racks and overhead cooling and electrical distribution inside the halls; it does not add floors or occupancy. Buildings are set back 100 feet or more from property lines and 150 to 200 feet from any existing dwelling, so the visual effect of the added 8 feet 8 inches at the property line is minor.

2. Site coverage — calculation

Site coverage was measured for the AEPCO property (Sheet D-1, C201, October 13, 2026, and the civil model behind it) within that parcel boundary, which computes to about 400 acres. The zoning regulations define site coverage as the percentage of the site covered with structures, buildings, paving and impervious surfaces, excluding landscaping, gravel, walls and fences. Coverage is therefore tabulated by use: the buildings; the dry-cooler banks, which are structures set on gravel; the battery storage pads, measured as the concrete under the battery units and their medium-voltage skids (two yards per building, each about 670 by 185 feet, holding 252 units in rows laid out to the manufacturer's clearances); the 50-foot asphalt roads; and the paved aprons, parking and internal drives on the equipment pads, taken as one-half of the pad area that remains after the buildings, coolers and battery yards, with the other half gravel or landscape. Gravel yard surfaces, gravel aisles between the batteries, landscaping, the detention facility and the septic fields are shown separately and are not counted.

Component (concept plan, Sheet D-1 / C201, and civil model; AEPCO property, about 400 acres)	Acres	Percent of site
Computing buildings (5 at about 1,897 ft x 260 ft, about 493,000 SF each)	56.6	14.2%
Electrical buildings (5 at about 620 ft x 75 ft)	5.3	1.3%
Dry-cooler banks (10 at about 619 ft x 137 ft); structures set on gravel	19.1	4.8%

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Component (concept plan, Sheet D-1 / C201, and civil model; AEPCO property, about 400 acres)	Acres	Percent of site
Battery storage pads: concrete under 2,520 battery units and 1,260 medium-voltage skids in 10 yards	17.0	4.2%
Roads: 50-ft asphalt loops and access drives (about 20,700 ft)	24 to 27	6 to 7%
Paved aprons, parking and internal drives on the equipment pads (one-half of the remaining pad area)	46.7	11.7%
Total site coverage (structures, buildings and paving)	169 to 172	42 to 43%
Impervious area for drainage (dry coolers excluded)	150 to 153	37 to 38%
Not counted: gravel and landscape on the pads (46.7), gravel aisles in the battery yards (11.5), detention facility (7.6), septic fields (4.1), undeveloped land including the 100-year floodplain corridors (about 158)	about 228	about 57%
Rural district site coverage standard (2.15.040)	100.0	25%

Coverage by buildings alone is about 15.5 percent (14.2 percent for the computing buildings and 1.3 percent for the electrical buildings), within the 25 percent standard. The exceedance comes from the outdoor equipment that the dry-cooled, water-conserving design requires: the dry-cooler banks (4.8 percent), the battery storage pads (4.2 percent), the campus roads (6 to 7 percent) and the paved portion of the equipment pads (11.7 percent). Total site coverage on the AEPCO property is about 42 to 43 percent, and about 45 to 46 percent if the battery yards are paved rather than gravel-surfaced with concrete pads. The impervious area for drainage purposes is lower, about 37 to 38 percent, because the dry coolers stand on gravel. The 347.8-acre Southline Transmission property (Sheet D-2) is laid out to the same building-and-yard pattern with four buildings; on the same basis its coverage is expected to be about 40 percent, and it will be computed with the building-permit plans. Construction laydown yards and worker parking are temporary, gravel-surfaced uses and are not counted as permanent coverage. If the additional land north of the AEPCO property is secured and added to the campus, the same buildings and yards would be measured against a larger site and overall coverage would fall accordingly. The applicant therefore requests that the Special Use Authorization permit site coverage of up to 50 percent for the campus on both properties as shown on the concept plan. Building locations, sizes and equipment layouts on the concept plan are conceptual; adjustments that remain within the approved setbacks, height and coverage limits will be handled at building permit.

3. Why the modification is appropriate

- The exceedance is created by the water-conserving design. Dry coolers occupy far more ground than the cooling towers of a conventional data center but use no evaporative water. The County's data-center standards favor non-potable and minimal water use; the equipment yards are the physical footprint of that choice.
- The covered area is low-intensity. Equipment yards are unoccupied, unlit except during work, fenced, and single-level; they generate no traffic, odor or waste of their own. The intensity of use on the site is governed by the buildings and a modest operations staff, not by the yard area.
- The parcel is large and the layout keeps the perimeter open. All buildings and yards are at least 100 feet from property lines and 150 to 300 feet from any existing dwelling. About 42 percent of the AEPCO property remains undeveloped, including the 100-year floodplain corridors shown on the plan, the detention facility, the septic fields and native vegetation buffers along U.S. Highway 191 and the adjoining Rural parcels, and a further 15 percent of the site, within the developed pads, is gravel or landscape rather than structure or paving.
- No neighboring property is deprived of a right or privilege. The site adjoins a generating station and its evaporation ponds; the campus is a lower-intensity industrial neighbor than the existing use.

4. Construction hours and construction lighting

Each construction phase will run around the clock for approximately one to two years, with phases overlapping, which keeps work, deliveries and commuting at a steady rate rather than concentrating them at peak hours and shortens the total construction period. The construction workforce, on the order of 5,500 at peak, is moved largely by a worker shuttle from off-site park-and-ride lots with staggered shift starts (Operations Narrative, Section 10). The outdoor

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lighting code allows temporary construction lighting only for a limited period, far shorter than the construction schedule. The applicant requests that the Special Use Authorization authorize 24-hour construction and shielded, downward-directed construction lighting for the duration of each phase, limited to active work areas, aimed away from U.S. Highway 191 and residences.

5. Drainage commitment for the additional coverage

The applicant will follow all applicable drainage criteria to address the additional lot coverage. Specifically, the applicant commits to comply with the Cochise County Floodplain Regulations (November 2023), the Floodplain Review Checklist, and the Cochise County Stormwater Ordinance, including the following:

- A drainage analysis certified by an Arizona registered professional civil engineer, with grading plans and a drainage report, submitted and approved before construction begins, and a Floodplain Use Permit for any disturbance within a regulatory floodplain or erosion-hazard area.
- Retention and detention facilities sized for the full developed area, including equipment yards and roads, so that post-development discharge at the property line does not exceed pre-development rates for the design storms the County requires, with no adverse impact to adjacent parcels, U.S. Highway 191 or downstream drainage. The detention facility shown on the concept plan will be sized in the drainage report and expanded or supplemented as that analysis requires.
- Basins designed to drain within 24 hours; finished floors set at least one foot above the determined water surface elevation; the 100-year floodplain corridors shown on the plan preserved and conveyed through or around the campus; and perimeter fencing in flood-prone areas designed not to obstruct flow.
- A post-construction stormwater management plan and operation and maintenance plan with best management practices for pollution, erosion and sediment control, and an AZPDES construction general permit with a stormwater pollution prevention plan during each construction phase.
- Gravel-surfaced equipment yards where equipment layout allows, including beneath the dry-cooler banks and in the aisles of the battery yards, and native vegetation retained outside the developed pads, to limit runoff from the covered area.

6. Request

The applicant respectfully requests that the Planning and Zoning Commission, in approving the Special Use Authorization, (1) modify the Rural district height limit to allow computing buildings and outdoor mechanical equipment up to 40 feet under Section 2.51.040.5.a, (2) permit site coverage of up to 50 percent for the campus on both properties as shown on the concept plan, and (3) authorize 24-hour construction and construction lighting for the duration of each construction phase as described in Section 4, subject to the drainage commitments in Section 4 as conditions of approval. If the County requires the site coverage relief to be processed as a variance, the applicant requests that this letter serve as the written request and will complete the Board of Adjustment process concurrently.

Sincerely,

Michael Smith
Authorized Representative
Tombstone Resources L.L.C.

Appendix J

Utility Availability Information
(Section 2.51.040.3.c · electric service)

Utility availability narrative, followed by the signed letters of Sulphur Springs Valley Electric Cooperative (October 28, 2026) and Arizona Electric Power Cooperative (Arizona G&T; October 29, 2026) on the source and capacity of electric service for the projected demand (approx. 6 GW, or 6,000 MW, at full build-out of both properties in four phases; Phase 1 approx. 1,500 MW). The interconnection and switchyard are a separate Arizona Corporation Commission review.

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October 30, 2026

Cochise County Development Services
Attn: Christine McLachlan, AICP, Director
1415 W. Melody Lane, Building F
Bisbee, Arizona 85603

Re: Special Use Authorization — Utility Availability Information (Appendix J)
Zoning Regulations Section 2.51.040.3.c — electric and telecommunications service
Data center campus, approximately 747 acres on two properties, Rural zoning
Unincorporated Cochise County, Arizona

Director McLachlan:

This narrative describes the source and capacity of electric and telecommunications service for the proposed campus, as required by Section 2.51.040.3.c, and summarizes the utility improvements that will be built to serve it. Written confirmation from Sulphur Springs Valley Electric Cooperative (SSVEC) and Arizona Electric Power Cooperative (AEPCO / Arizona G&T Cooperatives) of the source and capacity of electric service follows this narrative in the form of each cooperative's letter of willingness to serve.

1. Electric service providers

Retail electric service is provided by SSVEC, the distribution cooperative that serves this part of Cochise County. SSVEC is a member-owner of AEPCO, the generation and transmission cooperative whose Apache Generating Station adjoins the site and whose 230 kV and 345 kV transmission facilities pass the property. Service will be delivered under a three-party Electric Energy Services Agreement (EESA) among SSVEC, AEPCO and the applicant, which includes a community benefits plan (Schedule 14) memorializing the arrangement described in Section 5 below, so that the County, the Arizona Corporation Commission and the public can see the terms in one place. The EESA will be submitted to the Arizona Corporation Commission for review under its large-load agreement process for cooperatives (Docket No. E-01773A-26-0123), which examines whether the agreement is in the public interest, whether its rates are reasonable, and whether it ensures that no other customer class subsidizes the project. The applicant pays the full cost of the facilities built to serve it.

2. Projected demand and phasing

The campus is planned for approximately 6 gigawatts (6,000 MW) of electric demand at full build-out, delivered in four phases. Phase 1 is approximately 1,500 MW. Initial electric service for construction is targeted for April 2027; the Phase 1 computing load follows as the transmission facilities that serve it are completed, so that computing buildings are energized in step with the grid improvements that serve them. The load is steady and continuous (24 hours a day, year-round), with high load factor and on-site battery storage that smooths short fluctuations and carries the computing load through grid disturbances.

AEPCO's letter states that preliminary transmission studies indicate Phase 1 is feasible with the identified network upgrades, and that service beyond Phase 1 will require further study and may require additional generation and transmission facilities. That sequence matches the phased approval requested in this application: each phase is energized only when the studies, facilities and agreements for that phase are complete, and the applicant will supplement this appendix as each phase is confirmed.

3. How the power is delivered: grid service

The campus takes its power from the grid; standby generation is limited to natural-gas units for critical services (about 10 MW per building). AEPCO supplies the load through its generation portfolio and, principally, through transmission rights and market access that the cooperative has built across the Western Interconnection over many years. Those rights allow the cooperative to purchase energy from existing generation in neighboring markets that would otherwise sit idle or be curtailed, and to deliver it to Cochise County. The applicant's on-site batteries smooth the campus's draw on the grid and carry the load through disturbances. The generation resources needed to supply the campus are

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AEPCO's responsibility under the wholesale agreement and are being studied together with the transmission facilities.

4. Grid improvements to serve the campus

Serving the load requires a program of transmission and substation improvements in Cochise County, all paid for by the applicant through the EESA and built and owned by the cooperatives. In plain terms:

- Existing transmission lines are reconductored with modern high-capacity conductor, raising the capacity of lines already in place by roughly three and a half times without new corridors.
- New transformer banks, circuit breakers and switchyards are added, including a utility-owned substation on the campus (shown at the southwest corner of the AEPCO property on the concept plan) and additions at the cooperative's existing substations .
- New transmission reaching the area is already approved and its right-of-way acquired (the Southline transmission project); this application does not propose new transmission corridors, and any Certificate of Environmental Compatibility is obtained by the utilities under the Arizona Corporation Commission's process, separate from this Special Use Authorization (Section 2.51.040.2.c).
- The system is designed to the same reliability standard that applies today. North American Electric Reliability Corporation contingency requirements are met by adding transformer capacity and switching, not by relaxing them; the campus does not reduce reliability for existing members.
- Major equipment (transformers, breakers, gas-insulated switchgear) is procured or on order so that each phase of grid work is complete before the computing buildings it serves are energized.

The applicant's investment in grid infrastructure in Cochise County is expected to be on the order of $3.6 billion across the four phases. The system impact, electromagnetic transient, affected system, facilities and generation studies described in AEPCO's letter are under way through the cooperatives' coordinated interconnection study process.

5. Rate-payer protection and community benefit

Because the EESA recovers the full cost of the improvements from the applicant, existing SSVEC and AEPCO members do not pay for facilities built to serve the campus. Beyond that protection, the applicant has agreed to pay for power above the cooperatives' cost of service. The arrangement being finalized with the cooperatives will be set out in the community benefits plan attached to the EESA and submitted to the Arizona Corporation Commission for approval. In general terms:

- SSVEC: the premium the campus pays to SSVEC is directed to three purposes. First, an administrative service fee that becomes permanent equity of the cooperative, giving SSVEC a reserve that reduces borrowing for new plant and supports stable member rates for years to come. The campus will be a Class A member of SSVEC like every other member, with one vote, and will receive capital credit retirements as any member does; the applicant intends to return the capital credits it receives to the other members. Second, a direct reduction in member rates. Third, a contribution to the SSVEC Foundation for education and other community programs, under the Foundation's existing governance and external audit.
- AEPCO: a fee on the wholesale energy delivered to the campus. The fee adds to AEPCO's margins, which are allocated to its member cooperatives as patronage capital or invested in electrical infrastructure such as transmission; the applicant is not an AEPCO member and receives none of it. Because the campus will be the largest user of AEPCO's transmission system and will carry a proportionate share of its fixed costs, the cost of wholesale transmission service is expected to fall for all of AEPCO's transmission customers, including its member cooperatives and the cities of Safford and Thatcher.

The cooperatives' letters in this appendix describe these benefits in their own words: SSVEC cites reductions in residential electric bills, additional cooperative margins that could support the return of patronage capital to members, and funding for education and other community programs through the SSVEC Foundation; AEPCO notes that revenue under the EESA is expected to help moderate wholesale power costs for all of its members and that the network upgrades are expected to strengthen reliability for members and others served by its transmission system. The amounts and their timing will be set in the final EESA and are subject to Commission approval under Docket No. E-01773A-26-0123. The benefits begin once the campus is consuming power and grow with each phase.

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6. On-site electrical facilities

From the utility-owned substation, applicant-owned medium-voltage distribution runs across the campus to electrical buildings at each computing building. Battery energy storage in screened yards provides ride-through on loss of utility power; natural-gas standby generators serve critical services only; uninterruptible-power equipment serves the network rooms. These facilities are described in the Operations and Fire Protection narratives (Appendices E and G).

7. Natural gas

Pipeline natural gas is required only for the standby generators and is a small, intermittent load. Service will be taken from the pipeline system that already serves the Apache Generating Station area or from the local gas utility.

8. Telecommunications

The campus requires high-capacity fiber-optic connectivity. Diverse fiber routes will be provided along the U.S. Highway 191 and transmission corridors from more than one carrier. On-campus fiber is applicant-owned and placed underground. No communications towers are proposed under this application, other than building-mounted antennas for campus security and operations.

9. Water and wastewater

No public water or sewer service exists or is requested. Water supply and on-site wastewater are addressed in the Water Narrative (Appendix F) and on the County forms.

10. Documentation

Inserted behind this narrative: (a) letter of Sulphur Springs Valley Electric Cooperative, Inc. confirming its willingness to provide retail electric service (Daniel Wilson, Senior Vice President, Member and Corporate Services); (b) letter of Arizona Electric Power Cooperative, Inc. dated October 29, 2026 confirming its willingness to provide wholesale power supply and transmission service and the feasibility of Phase 1 with the identified network upgrades (Patrick Ledger, Executive Vice President and Chief Executive Officer). The applicant will supplement this appendix as the interconnection studies and service agreements are completed.

Sincerely,

Michael Smith
Authorized Representative
Tombstone Resources L.L.C.

Sulphur Springs Valley Electric Cooperative, Inc.
OWNED BY THOSE WE SERVE A Touchstone Energy® Cooperative

October 28, 2026

Christine McLachlan, Director
Cochise County Development Services

Re: SSVEC Willingness to Serve the Tombstone Resources LLC Project

Dear Ms. McLachlan:

Sulphur Springs Valley Electric Cooperative, Inc. ("SSVEC") understands that Tombstone Resources LLC ("Applicant") is seeking approval of a Special Use Permit for the Tombstone Resources LLC Supercomputing Facility ("Project"), located in Cochise County, Arizona ("Property"). SSVEC would serve as the retail electric provider, with Arizona Electric Power Cooperative, Inc. ("AEPCO") serving as the wholesale power and transmission provider. The Applicant has identified projected electrical demand of approximately 1,500 MW in Phase 1, growing to approximately 6,000 MW at full build-out. AEPCO is separately providing documentation addressing wholesale power supply, transmission capacity, and availability.

The Property is located within SSVEC's certificated electric service territory. SSVEC is willing to work with the Applicant to provide retail electric service to the Project, subject to completion of the necessary engineering and power supply studies, negotiation and execution of mutually acceptable agreements, satisfaction of applicable interconnection and system requirements, and receipt of all required regulatory approvals.

The Applicant has identified April 2027 as its target for receiving initial service from SSVEC. The amount of load that may be energized at that time, and the schedule for subsequent increases in service, remain subject to completion of the required studies, availability of power supply and transmission capacity as addressed by AEPCO, construction of necessary facilities, execution of applicable agreements, and receipt of required approvals.

SSVEC, AEPCO, and the Applicant will continue working together to evaluate the Project's phased energy and capacity requirements and the facilities, transmission improvements, generation resources, and other infrastructure necessary to serve those requirements. Final service capacity, phasing, energization dates, and technical requirements will depend upon the results of those studies and completion of the required facilities.

Anticipated facilities include an on-site substation and associated transmission connections and upgrades, with final scope and responsibility to be established through engineering studies and the applicable agreements. Retail service will be provided only as the facilities, power supply, transmission capacity, and approvals required for each stage are in place.

SSVEC will require service arrangements designed to protect existing members from costs attributable to the Project and to maintain safe and reliable service. The Applicant will be responsible for costs attributable to serving the Project, including required new infrastructure and transmission facilities, through the applicable development, electric service, interconnection, and related agreements. Required system studies will identify improvements and operating requirements necessary to avoid adverse impacts on service to existing members.

The electric service agreement will be submitted for Arizona Corporation Commission ("ACC") review under the large-load agreement process established in Docket No. E-01773A-26-0123. That process includes review of whether the agreement is in the public interest, whether its rates are reasonable, and whether it ensures that no other customer class of AEPCO or the participating distribution cooperatives subsidizes the large-load customer's commercial activities. Service remains subject to ACC approval of the applicable agreement.

Beyond protecting existing members from Project-related costs, SSVEC is negotiating service arrangements intended to provide direct financial benefits to its membership and the communities it serves. Benefits under discussion include reductions in residential electric bills, additional cooperative margins that could support the return of patronage capital to members, and funding for education and other community programs through the SSVEC Foundation. The amount and timing of these benefits will depend on the final negotiated agreements, the Project's actual development and operation, ACC approval where required, and applicable SSVEC Board decisions. These potential benefits are not guaranteed.

This letter confirms SSVEC's willingness to continue working toward providing electric service to the Project. It does not constitute a guarantee of a particular level of service, energization date, rate, or other final service term, all of which remain subject to the studies, agreements, conditions, and regulatory approvals described above.

SSVEC believes this letter demonstrates the availability of a reasonable path to electric service for purposes of the Applicant's Special Use Permit application. Please contact us if additional information is required.

Sincerely,



Daniel Wilson, SVP Member and Corporate Services
Sulphur Springs Valley Electric Cooperative, Inc.

Arizona G&T Cooperatives

Touchstone Energy® Cooperatives

October 29, 2026

Ms. Christine McLachlan, Director
Cochise County Development Services

RE: AEPCO WILLINGNESS TO SERVE THE TOMBSTONE RESOURCES LLC SUPERCOMPUTING FACILITY

Dear Ms. McLachlan:

Arizona Electric Power Cooperative, Inc. ("AEPCO") understands that Tombstone Resources LLC ("Applicant") is seeking approval of a Special Use Permit for the Tombstone Resources LLC Supercomputing Facility ("Project"), a proposed large-load data center development located in Cochise County, Arizona ("Property"). AEPCO provides this letter in support of the Applicant's Special Use Permit application.

AEPCO is a not-for-profit generation and transmission cooperative that provides wholesale power supply and transmission services to its member distribution cooperatives ("Members"), including Sulphur Springs Valley Electric Cooperative, Inc. ("SSVEC"). The Property is located within SSVEC's certificated electric service territory, adjacent to AEPCO's Apache Generating Station, a large industrial facility that has operated since 1964. SSVEC will provide retail electric service to the Project, and AEPCO will serve as the wholesale power and transmission provider. In that role, AEPCO will plan, develop, and provide the generation, transmission, and other wholesale resources and facilities needed to deliver power to SSVEC for service to the Project.

AEPCO is committed to working with SSVEC and the Applicant to serve the Project. Service will be provided subject to the final negotiation and approval of the required agreements described below and following completion of the required studies, and receipt of applicable regulatory approvals.

The Applicant has identified projected electrical demand of approximately 1,500 MW in Phase 1, growing to approximately 6,000 MW at full build-out. Preliminary transmission studies show that Phase 1 can be served with the identified network upgrades, and AEPCO is working with Applicant on acquiring the generation and transmission resources needed to provide adequate capacity for the Project's projected demand. Additional study work is under way, including system impact, electromagnetic transient, affected system, facilities, and generation studies. These studies will define the transmission facilities and network upgrades, the on-site substation and associated transmission connections, the generation resources, and the operating requirements needed to serve the Project reliably. AEPCO will continue this study work for later phases, which are expected to require additional generation and transmission facilities.

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The Applicant will be responsible for costs attributable to serving the Project, including the generation, transmission, and other facilities and resources required to serve it and the associated capacity obligations. AEPCO will structure its participation so that AEPCO, its Members, and their end-use customers are protected from any costs and risks created by the Project.

AEPCO, SSVEC, and the Applicant are working toward a three-party Electric Energy Services Agreement ("EESA"), under which AEPCO will provide the wholesale power supply and transmission service needed to serve the Project. The agreement will be submitted for Arizona Corporation Commission ("ACC") review under the large-load agreement process established in Docket No. E-01773A-26-0123. That process includes review of whether the agreement is in the public interest, whether its rates are reasonable, and whether it ensures that no other customer class of AEPCO or the participating distribution cooperatives subsidizes the large-load customer's commercial activities. Service remains subject to ACC approval of the EESA.

In addition to allocating Project costs directly to the Applicant and away from Members, the EESA enables AEPCO to deliver meaningful benefits back to Members and the rural Arizona communities they serve. Because AEPCO is a not-for-profit cooperative, revenue under the EESA is expected to help stabilize or reduce rates for all of AEPCO's Members. Remaining margins from serving the Project are expected to be allocated to AEPCO's Members as patronage capital, strengthening the cooperatives and the end-use members who own them. Under the G&T cooperative model, our Members control how margins from this agreement would be used through their representation on our Board of Directors. The transmission upgrades required to serve the Project, paid for by the Applicant, are also expected to strengthen reliability for Members and others served by AEPCO's transmission system.

This letter confirms AEPCO's commitment to continue to work with SSVEC and the Applicant to provide the wholesale resources and facilities needed to serve the Project. Final service terms, including service levels, energization dates, and rates, will be set in the EESA and subject to approval by the ACC.

AEPCO is prepared to provide the wholesale power supply and transmission service needed for the Project and supports approval of the Applicant's Special Use Permit application. Please contact us with any questions.

Sincerely,



Patrick Ledger
Executive Vice President and Chief Executive Officer

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