



August 14, 2025

Via Email

The Boring Company
c/o Ashley Steinberg, Head of Legal Affairs
ashley@boringcompany.com

Re: NOTICE TO CEASE AND DESIST -3824 Paradise Rd. Las Vegas, NV 89169

Dear Ms. Steinberg,

On August 12, 2025, the Nevada Division of Environmental Protection (NDEP) received an anonymous complaint alleging that, on April 21, 2025, The Boring Company (TBC) discharged untreated water from TBC-owned holding tanks into two manholes and two cleanouts connected to the Clark County Water Reclamation District's (District) Publicly Owned Treatment Works (POTW) at 3824 Paradise Rd., Las Vegas, NV 89169 (Property).

In response, at approximately 1:00 p.m. on August 13, 2025, District pretreatment inspectors conducted an on-site inspection and confirmed the existence of an active illicit discharge of what appeared to be drilling fluids/spoils to the POTW through two direct connections to on-site cleanouts. The inspection further revealed extensive damage to the District's infrastructure as a result of TBC's discharges. TBC's unauthorized discharge to the POTW is an egregious knowing violation of the District's Service Rules and applicable federal environmental regulations, and further constitutes a continuing threat to "critical infrastructure" as defined by the Department of Homeland Security. Revealing TBC's true intent, TBC's illicit and destructive activity continued despite the District inspector's immediate verbal directives to cease all such activity.

District inspectors returned to the Property the next day (August 14, 2025), and again observed a continued illegal discharge to the POTW – but the illicit discharge was now expanded to include two District manholes. This time, a TBC superintendent (Flippo Fazzino) feigned compliance with District demands to cease the discharge by removing the connections to the on-site cleanouts, only to immediately replace them after he assumed District inspectors had departed the Property. Notably, Mr. Fazzino attempted to minimize the extent of the discharge by falsely claiming that the discharge was initiated only the night before – contrary to the District's inspection records from the day prior. TBC's brazen refusal to stop its illicit discharges after being caught in the act, coupled with TBC's representative's false statements to District inspectors, proves TBC's activities to be knowing and intentional.

The District hereby directs TBC to immediately and permanently cease all unauthorized discharges into the District's POTW.

BOARD OF TRUSTEES
Tick Segerblom, *Chair* • Justin Jones, *Vice Chair*
April Becker • James B. Gibson • Marilyn Kirkpatrick • William McCurdy II • Michael Naft
Thomas A. Minwegen, *General Manager*

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August 14, 2025

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Please note that the District is actively investigating the extent of the damage caused by these violations, and once sufficient information is obtained, the District will be initiating formal enforcement action against both TBC and the Property Owner. Continued noncompliance will result in escalating enforcement measures including, but not limited to, disconnecting the POTW from the Property, civil or criminal enforcement, and/or referral to the United States Environmental Protection Agency and the Department of Homeland Security (as a continuing threat to critical infrastructure). You will be formally notified of enforcement actions and associated penalties in the coming days.

Should you have any questions regarding this matter, please contact me at 702-668-8041 or dstoft@cleanwaterteam.com.

Sincerely,

A handwritten signature in black ink, appearing to read "D.J. Stoft". The signature is written in a cursive, slightly slanted style.

David J. Stoft
General Counsel



August 14, 2025

Via Certified Mail

**CERTIFIED: # 7020 3160 0000 0217 7705
RETURN RECEIPT REQUESTED**

OBJECT DASH LLC
130 Walker Watson Rd.
Bastrop, TX 78602

**CERTIFIED: # 7020 3160 0000 0217 7712
RETURN RECEIPT REQUESTED**

OBJECT DASH LLC
3824 Paradise Rd.
Las Vegas, NV 89169

Re: NOTICE TO CEASE AND DESIST -3824 Paradise Rd. Las Vegas, NV 89169

Dear Property Owner,

On August 12, 2025, the Nevada Division of Environmental Protection (NDEP) received an anonymous complaint alleging that, on April 21, 2025, The Boring Company (TBC) discharged untreated water from TBC-owned holding tanks into two manholes and two cleanouts connected to the Clark County Water Reclamation District's (District) Publicly Owned Treatment Works (POTW) at 3824 Paradise Rd., Las Vegas, NV 89169 (Property).

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District inspectors returned to the Property the next day (August 14, 2025), and again observed a continued illegal discharge to the POTW – but the illicit discharge was now expanded to include two District manholes. This time, a TBC superintendent (Flippo Fazzino) feigned compliance with District demands to cease the discharge by removing the connections to the on-site cleanouts, only to immediately replace them after he assumed District inspectors had departed the Property. Notably, Mr. Fazzino attempted to minimize the extent of the discharge by falsely claiming that the discharge was initiated only the night before – contrary to the District's inspection records from the day prior. TBC's brazen refusal to stop its illicit discharges after being caught in the act, coupled with TBC's representative's false statements to District inspectors, proves TBC's activities to be knowing and intentional.

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August 14, 2025

Page 2

As the legal owner of the Property, you are responsible for all activities occurring on the premises, including unauthorized discharges into the District's POTW. As such, the District hereby demands that you direct an immediate and permanent stop to all illicit discharges occurring on the Property.

Please note that the District is actively investigating the extent of the damage caused by these violations, and once sufficient information is obtained, the District will be initiating formal enforcement action against both TBC and you, the Property Owner. Continued noncompliance will result in escalating enforcement measures including, but not limited to, disconnecting the POTW from the Property, civil or criminal enforcement, and/or referral to the United States Environmental Protection Agency and the Department of Homeland Security (as a continuing threat to critical infrastructure). You will be formally notified of enforcement actions and associated penalties in the coming days.

Should you have any questions regarding this matter, please contact me at 702-668-8041 or dstoft@cleanwaterteam.com.

Sincerely,



David J. Stoft
General Counsel

Cc: Ashley Steinberg
Flippo Fazzino

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

OBJECT DASH LLC
130 Walker Watson Rd.
Bastrop, TX 78602



9590 9402 8749 3310 4084 01

2. Article Number (Transfer from service label)

7020 3160 0000 0217 7705

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Handwritten Signature]

- Agent
- Addressee

B. Received by (Printed Name)

Jason Demons

C. Date of Delivery

8/22/25

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation
- Signature Confirmation Restricted Delivery

Mail Restricted Delivery (over \$500)

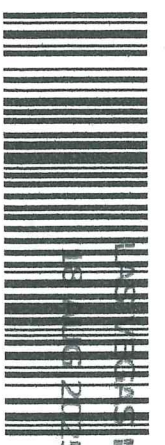


Clark County Water
Reclamation District
5857 East Flamingo Road
Las Vegas, Nevada 89122

RECEIVED
SEP 16 2025

BY:

CERTIFIED MAIL



7020 3160 0000 0217 7712



quadrant
FIRST-CLASS MAIL
IMI
\$010.44
08/18/2025 ZIP 89122
043M31247016

OBJECT DASH LLC
3824 Paradise
Las Vegas, NV 891

91694204-1N

OBJECT DASH LLC 891694204-1N 009 09/04/25
NIXIE 891 DE 1809 0009/14/25
RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD
RC: 891694204/3/ 09/04/25-18-59

US POSTAGE



VIA EMAIL

David Stoft
General Counsel
Clark County Water Reclamation District
dstoft@cleanwaterteam.com

August 15, 2025

Mr. Stoft:

The Boring Company (TBC) is in receipt of your August 14, 2025 letter and is writing to acknowledge that water was improperly discharged to the sewer system. We are currently investigating the matter, and will remain transparent with respect to facts we learn and to corrective actions.

Since CCWRD's inspection, TBC has undertaken the following actions:

- Physically disconnected the subject sewer connections.
- Met with NDEP and DNR, who will allow TBC to utilize an existing NPDES permit to discharge treated groundwater to the storm drain when it meets NPDES standards.
- Commenced the sealing of groundwater leaks in our tunnels.
- Conducted a stand-down on mining operations to work on water management and training.

We would like to meet with you to brief you on the issue at your convenience. Thank you for your consideration.

Regards,

/s/ Ashley Steinberg
Ashley Steinberg
Director of Legal Affairs
The Boring Company

Cc: Tara Teegarden, Thomas Minwegen, Jolene Bradley



September 2, 2025

Via Certified Mail

**CERTIFIED: # 7020 3160 0000 0217 7750
RETURN RECEIPT REQUESTED**

**CERTIFIED: # 7020 3160 0000 0217 7767
RETURN RECEIPT REQUESTED**

THE BORING COMPANY
130 Walker Watson Rd.
Bastrop, TX 789602

OBJECT DASH LLC
50 W. Liberty St. Suite 1100
Reno, NV 89501

Re: Notice to Appear: Show Cause Hearing Regarding Unauthorized Discharges to POTW

Dear Property Owner and The Boring Company,

This letter serves as formal notice that the Clark County Water Reclamation District (District) is initiating enforcement proceedings concerning unauthorized discharges into the District's Publicly Owned Treatment Works (POTW) originating from two different drilling sites: 3824 Paradise Rd. and 4744 Paradise Rd.

As documented in the District's cease and desist correspondence dated August 14, 2025, District pretreatment inspectors observed and recorded multiple violations by The Boring Company (TBC) at 3824 Paradise Rd. involving the illicit discharge of drilling fluids/spoils directly into the District's POTW through an authorized connection to onsite cleanouts and District manholes. Upon further inspection of other TBC drilling locations, District inspectors identified the additional discharge of drilling fluids/spoils directly into the District's POTW at 4744 Paradise Rd. Both the Property Owner and TBC are responsible for these illicit activities.

Given the above, the District **ORDERS** the Property Owner and TBC to appear before the District Hearing Officer at 9:00 A.M. on September 30, 2025, at its main office located at 5857 E. Flamingo Road, Las Vegas, NV 89122 to **SHOW CAUSE** why all available enforcement actions should not be taken against the Property Owner and TBC accordingly, including but not limited to, damage reimbursement, fines and/or penalties, and/or the refusal of all discharges from these TBC station locations. At the Show Cause Hearing, the Property Owner and TBC will have an opportunity to respond to the above-referenced violations.

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April Becker • James B. Gibson • Marilyn Kirkpatrick • William McCurdy II • Michael Naft
Thomas A. Minwegen, *General Manager*

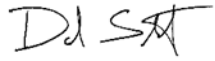
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September 2, 2025

Page 2 of 2


Should you have any questions regarding this matter, please contact me at 702-668-8041 or dsoft@cleanwaterteam.com.


Sincerely,

A handwritten signature in black ink, appearing to read "D.J. Stoft". The letters are cursive and somewhat stylized.

David J. Stoft
General Counsel

Cc: Ashley Steinberg (ashley@boringcompany.com)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: THE BORING COMPANY 130 Walker Watson Rd. Bastrop, TX 789602	B. Received by (Printed Name)	C. Date of Delivery
 9590 9402 8749 3310 4075 10	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No	
2. Article Number (Transfer from service label) 7020 3160 0000 0217 7750	3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt		

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: OBJECT DASH LLC 50 W. Liberty St. Suite 1100 Reno, NV 89501	B. Received by (Printed Name) Cheryl Brimm	C. Date of Delivery 9-8-25
 9590 9402 8749 3310 4075 27	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No	
2. Article Number (Transfer from service label) 7020 3160 0000 0217 7767	3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt		



October 28, 2025

Via Certified Mail

**CERTIFIED: # 7020 3160 0000 0217 7798
RETURN RECEIPT REQUESTED**

THE BORING COMPANY
130 Walker Watson Rd.
Bastrop, TX 789602

**CERTIFIED: # 7020 3160 0000 0217 7804
RETURN RECEIPT REQUESTED**

OBJECT DASH LLC
C/O Kaempfer Crowell as Registered Agent
50 W. Liberty St. Suite 1100
Reno, NV 89501

Re: NOTICE OF VIOLATION AND ORDER TO SHOW CAUSE

Dear Object Dash LLC and The Boring Company,

On September 30, 2025, the Clark County Water Reclamation District (District) held a hearing regarding its Notice of Violation and Order to Show Cause (NOV) concerning prohibited discharges into the District's Publicly Owned Treatment Works (POTW) from two drilling sites operated by The Boring Company (TBC): 3824 Paradise Rd. and 4744 Paradise Rd (collectively, the Violations). In attendance for TBC were Nic Smith (Director of Safety and Security), David Buss (VP of Corporate Operations), Ashley Steinberg (Director of Legal), Tyler Fairbanks (Director of Project Development), and Stephanie Gronauer (Counsel). During this hearing, TBC acknowledged the circumstances of the violations and confirmed that TBC had agreed with Clark County officials that operations would not be expanded to new drilling locations along additional routes until certain conditions were met, including the full resolution of its prohibited discharges to the District's POTW.

The general circumstances of the Violations have been established. On August 12, 2025, the Nevada Division of Environmental Protection (NDEP) received an anonymous complaint alleging that, beginning April 21, 2025, untreated water from TBC-owned holding tanks was discharged to the District's POTW at 3824 Paradise Rd (Old Firefly Property). On August 13, 2025, District pretreatment inspectors conducted an on-site inspection and confirmed an active illicit discharge of what appeared to be drilling fluids/spoils into the District POTW via two on-site cleanouts and two manholes. District inspectors verbally directed TBC staff to cease the discharge, but TBC staff refused. On August 14, 2025, District inspectors returned to the Old Firefly Property and confirmed the illicit discharge and again directed TBC staff to cease the discharge. TBC staff ceased discharging, but only temporarily. Later that day, the District issued a formal Cease and Desist Notice to TBC and its Director of Legal, advising that a District investigation into the extent of the damage to the District POTW was underway. On August 15, 2025, TBC responded via letter, acknowledging the Violations, confirming that discharges had been ceased, and outlining corrective actions to be taken.

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Thomas A. Minwegen, *General Manager*

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District personnel continued monitoring the Old Firefly Property and expanded inspections to other TBC drilling sites along Paradise Rd. These inspections revealed additional unauthorized discharges at 4744 Paradise Rd. (Paradise Property). In the weeks that followed, District crews continued to monitor TBC's activities and cleaned the POTW adjacent to the Old Firefly Property and Paradise Property, removing and disposing of a total of approximately 12 cubic yards of drilling mud, drilling spoils, and miscellaneous solid waste that resulted from TBC's prohibited discharges. Throughout the event, District management met internally to ensure proper coordination of the District's responsive efforts.

TBC's actions constitute violations of federal laws and regulations (e.g. 40 CFR 403) and District Service Rules (SR), implicating various SRs that include but are not limited to 1.1.2, 1.1.6, 1.1.16, 1.1.17, 1.1.18, 1.1.22, 2.1.12, 2.1.14, 4.1.1, 4.1.3, and 4.1.6. Given the egregious nature of the Violations, the substantial damage to District infrastructure, the District emergency resources expended responding to the Violations, and TBC's acknowledgement of responsibility for the Violations, the parties have stipulated to an amount of \$493,297.08 to be paid by TBC (consisting of \$362,000 in penalties and \$131,297.08 in reimbursement for District expenses). A corresponding invoice is enclosed. Full and final payment must be made to the District on or before December 1, 2025. Once paid, the District's Order to Show Cause will be deemed closed, and the NOV fully resolved. Failure to timely pay the full amount owed will be deemed a further violation of District SRs and will result in additional enforcement actions. TBC shall cease and desist from any additional unauthorized discharges to the District's POTW.

Should you have any questions regarding this matter, please contact me at (702) 668-8041 or dstoft@cleanwaterteam.com.

Sincerely,



David J. Stoft
General Counsel

Enclosure

Cc: Stephanie Gronauer, Esq. (via email)
Ashley Steinberg, Esq. (via email)



Clark County
Water Reclamation District
 5857 East Flamingo Rd.
 Las Vegas, NV 89122-5598

(702) 668-8888 Phone
 (702) 668-9105 Fax
 M-TH 7:30am-4:30pm Hours

Bill To:
 Attn: Accounts Payable
 THE BORING COMPANY
 130 WALKER WATSON RD
 BASTROP TX 789602

Remit to:
 ATTN: ACCOUNTS RECEIVABLE
 5857 EAST FLAMINGO ROAD
 LAS VEGAS NV 89122-5598

Email:accountsreceivable@cleanwaterteam.com

Customer ID	Invoice Number	Invoice Date	Due Date
196060	14832	28-OCT-25	01-DEC-25

For more information about CCWRD services visit www.cleanwaterteam.com or www.paininthedrain.com

Item#	Description	Quantity	Unit Price	Amount
1	NOTICE OF VIOLATION (LETTER DATED OCTOBER 28, 2025) FOR PROHIBITED DISCHARGES TO THE DISTRICT'S PUBLICLY OWNED TREATMENT WORKS (POTW) - PENALTIES	1	\$362,000.00	\$362,000.00
2	REIMBURSEMENT FOR DISTRICT EXPENSES	1	\$131,297.08	\$131,297.08
			Total	\$493,297.08

Delinquent accounts will be assessed a 10% basic penalty.

Special Instructions	Total
	\$493,297.08

KEEP THIS PORTION FOR YOUR RECORDS

REMITTANCE

Customer ID	Invoice Number	Due Date	Amount Due	Amount Remitted
196060	14832	01-DEC-25	\$493,297.08	

MAKE ALL CHECKS PAYABLE TO:
 CLARK COUNTY WATER RECLAMATION DISTRICT
 ATTN: Accounts Receivable
 5857 East Flamingo Rd.
 Las Vegas NV, 89122

RETURN THIS PORTION WITH YOUR REMITTANCE