



Waterleaf Phase 1, LLC
9350 S 150 East #710
Sandy Utah 84070

Date: 12.05.2025

Utah State Engineer
Utah Division of Water Rights
P.O. Box 146300
Salt Lake City, Utah 84114-6300

RE: Letter of Support for Mango Spiral Jetty – Groundwater Water Right Applications
Beneficiary: Waterleaf Phase 1, LLC (Subsidiary of Lilac Solutions)

Dear State Engineer:

On behalf of Waterleaf Phase 1, LLC, a subsidiary of Lilac Solutions, Inc., this letter is submitted to formally express our full support for the approval of Utah Water Right Application No(s). 13-4105 and 13-4106 (the "Water Rights") filed by Mango-Spiral Jetty, LLC (the "Applicant").

Waterleaf intends to lease the Water Rights under a pending commercial water-use agreement with Mango Spiral Jetty. Upon execution of that agreement, Waterleaf will be authorized to use the approved groundwater diversions exclusively to support direct lithium extraction ("DLE") operations associated with Great Salt Lake brine resources.

The proposed groundwater use qualifies as a valid beneficial use under Utah law and directly supports the Division of Forestry, Fire and State Lands ("FFSL") Great Salt Lake management framework, including the responsible development of critical mineral resources that maintain public trust values while fostering economic development. Lithium is a federally recognized **critical mineral** essential to advanced manufacturing, energy storage, and domestic supply-chain security.

Waterleaf's DLE process is specifically designed to be non-consumptive with respect to Great Salt Lake brines. Local groundwater sourced from the Water Rights will be utilized for operational process support, after which the treated water will be discharged into the Great Salt Lake in full compliance with Waterleaf's Utah Pollutant Discharge Elimination System (UPDES) permit requirements, ensuring water quality protection and consistency with approved discharge parameters. The end destination of all groundwater diversions under the Water Rights

Waterleaf Phase 1, LLC

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WATER RIGHTS
SALT LAKE *NO*



will be Great Salt Lake, subject to continuous regulatory oversight by the Utah Division of Water Quality.

Approval of Mango Spiral Jetty's groundwater applications will enable a project that:

- Advances Utah's position in domestic critical-mineral production and supply-chain resilience;
- Supports regional economic development in the Box Elder County area;
- Implements innovative, low-impact, environmentally responsible technologies;
- Maintains non-consumptive lake water management objectives by returning treated water to the lake under UPDES compliance; and
- Aligns with the State of Utah's statutory definition of beneficial use.

Waterleaf affirms that any water developed pursuant to these applications will be managed and used in strict accordance with DWRe approvals, UPDES permit conditions, Utah administrative rules, and applicable state and federal statutes. We remain committed to close coordination with your office and all relevant agencies throughout the permitting, construction, and operational phases of the project.

Thank you for your consideration of the Water Right applications and for your continued stewardship of Utah's water resources. Should the Division require any additional technical detail regarding Waterleaf's role as beneficiary, operational water flows, or discharge compliance, we stand ready to provide supporting documentation.

Respectfully submitted,

Steve Morrey

Waterleaf Phase 1, LLC



Waterleaf Letter of Support

1 message

Steve Morrey <Steve.Morrey@lilacsolutions.com>
To: "waterrights@utah.gov" <waterrights@utah.gov>

Fri, Dec 5, 2025 at 4:03 PM

Good Afternoon

Please see attached letter of support for pending water rights approval of 13-4105 and 13-4106 for Mango Spiral Jetty.

Thanks

Steve

Steve Morrey

Sr. Project Director.

Lilac Solutions, Inc.

Steve.morrey@lilacsolutions.com

www.lilacsolutions.com

Mobile: +1-801-694-2245

LILAC

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