Overview of Plans for Physical Plant and Mechanical Systems

Physical plant and mechanical systems for the Gaming Facility will be designed around a natural gas-fired Combined Cooling, Heat and Power (CCHP) plant that will produce 75% of the new facility's electricity, 80% of heating and domestic hot water, and 50% of the cooling. This CCHP Central Plant will also support Traditions Resort's existing systems where possible, introducing peak load systems where necessary to meet increased demands.

Location and Approximate Square Footage of Dedicated Physical Plant Spaces

Equipment	Location	Square Footage
CCHP Generator / Exchangers	Sub-Basement	6,000 sq. ft.
Absorption Chiller and Pumps	Sub-Basement	6,000 sq. ft.
Air Handling Units (AHU)	Mezzanine/Back of House	1,000 sq. ft.
Energy Recovery Ventilators (ERV)	Roof	N.A.
Heat Rejection Equipment	Mechanical Courtyard	2,500 sq. ft.
Main Electrical Room	Sub-Basement	1,100 sq. ft.
4 Electrical/Data Rooms	Mezzanine and Casino Floor	200 sq. ft. each
Solar Photovoltaic Panels	Roof	27,000 sq. ft.

Plans for heating, air conditioning, and ventilation (HVAC) systems, plumbing systems, and electrical systems are discussed in following sections of this Exhibit.VIII.C.16, but a number of features are worth highlighting here.

Highlights of Energy Saving and Innovative Features

Combined Cooling, Heat and Power (CCHP) Central Plant System

- Efficient power generation
  During Phase I, a 1.1 MW CCHP natural-gas fired generator will be installed and will produce electricity to meet a significant portion of the full site's electricity needs with much greater efficiency than remote generation obtained from the power grid. During Phase II, a second 1.1 MW CCHP natural-gas fired generator will be installed.

  This innovative approach is in line with New York State's objective to promote distributed generation as an avenue for significant efficiency gains and emission reductions. Traditions Resort & Casino, LLC intends to work with distributed generation specialist ASI Energy of Ithaca, NY to pursue participation in NYSERDA's program for advancement of distributed generation in the State (NYSERDA PON 2568).

- Use of heat produced
  Heat from the CCHP generator will be used to provide heating and cooling for the facility. For cooling, one 400-ton absorption chiller will be installed in Phase I to receive hot water from the Phase I CCHP generator and a second absorption chiller will be installed to receive hot water from a new, high-efficiency gas boiler. In Phase II, the second CCHP generator will produce enough hot water to operate both chillers.

- Reduced emissions
  CCHP alternative energy systems are advocated by both the U.S. Department of Energy and the U.S. Environmental Protection Agency as being feasible and efficient means of reducing greenhouse gas and other emissions from conventional fossil fuel fired power plants. Efficiency rates of these systems are 50%-70% higher than traditional power generation due to the use of waste heat and the avoidance of losses over long-distance transmission and distribution lines.

- Provision of back-up systems to ensure smooth operation
  - Redundant and supplemental heating will be provided by a new, high-efficiency gas boiler.
  - Redundant and supplemental cooling will be provided by an absorption chiller served by the gas boiler.
  - A cooling tower will be installed to discharge heat removed from the Casino and the absorption units.

Renewable power generation

- Solar photovoltaic system
  During Phase I, a 200 kW solar PV system will be installed on the roof of the new Casino to produce clean power. Peak solar power production will match the peak need for cooling power at the spa and hotel.

This innovation is in line with New York State's objective to promote solar energy. Traditions Resort & Casino, LLC intends to work with solar power specialist Distributed Sun of Washington, DC to pursue participation in NYSERDA's program for advancement of solar photovoltaic power production in the State (NYSERDA PON 2112).

- Public outreach
  A kiosk will be placed in the Casino to display current information about output from the solar and CCHP systems as a point of interest for visitors and as an opportunity to educate viewers about the facility's use of renewable and innovative energy technologies.

High Efficiency Equipment

- Energy recovery air handling units (AHU) – Rooftop air handling units that heat and cool the Casino will use a heat wheel exchanger to pre-heat or pre-cool the large quantities of ventilation air required.
- High efficiency HVAC equipment will utilize CCHP heating and cooling with variable frequency drive control of fans.
- High efficiency lighting – Interior and exterior lighting will be predominately provided using LED fixtures.

Estimated kWh Electricity

Usage and Sources by Month (Phase I)

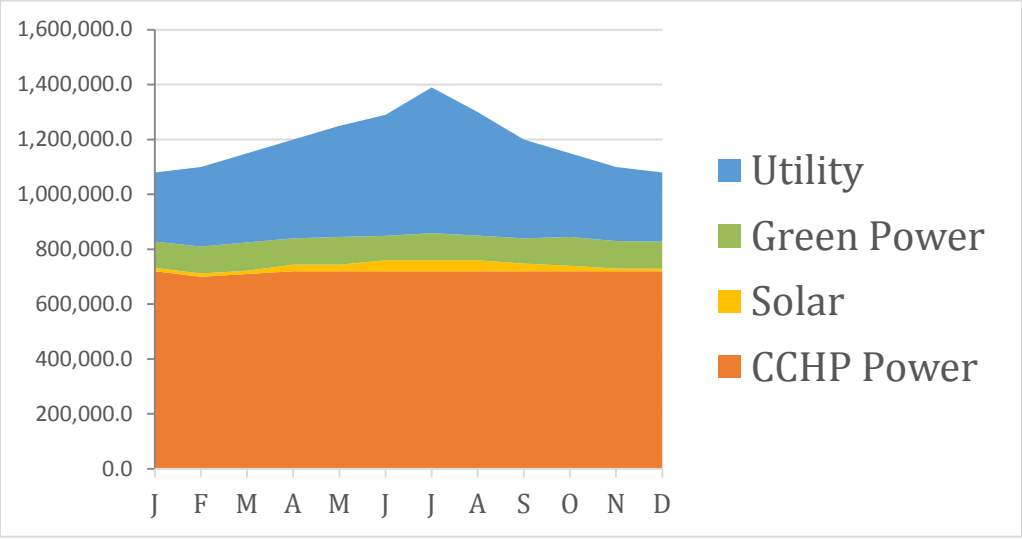

Figure VIII.C.16 - 1

Figure VIII.C.16-1 illustrates plans for meeting the Casino's electricity demand. Base electric load will be provided by CCHP generation. Solar power produced on site in combination with purchased green power will meet at least 10% of the new facility's electricity needs. The balance of electricity will be obtained from the local utility company.

The plan for meeting the heating and cooling demands of the new facilities is depicted in Figure VIII.C.16-2. The use of waste heat from the CCHP central plant system will result in highly efficient heating and cooling for the new facilities.

Estimated Therms, Heating and Cooling Usage and Sources by Month (Phase I)

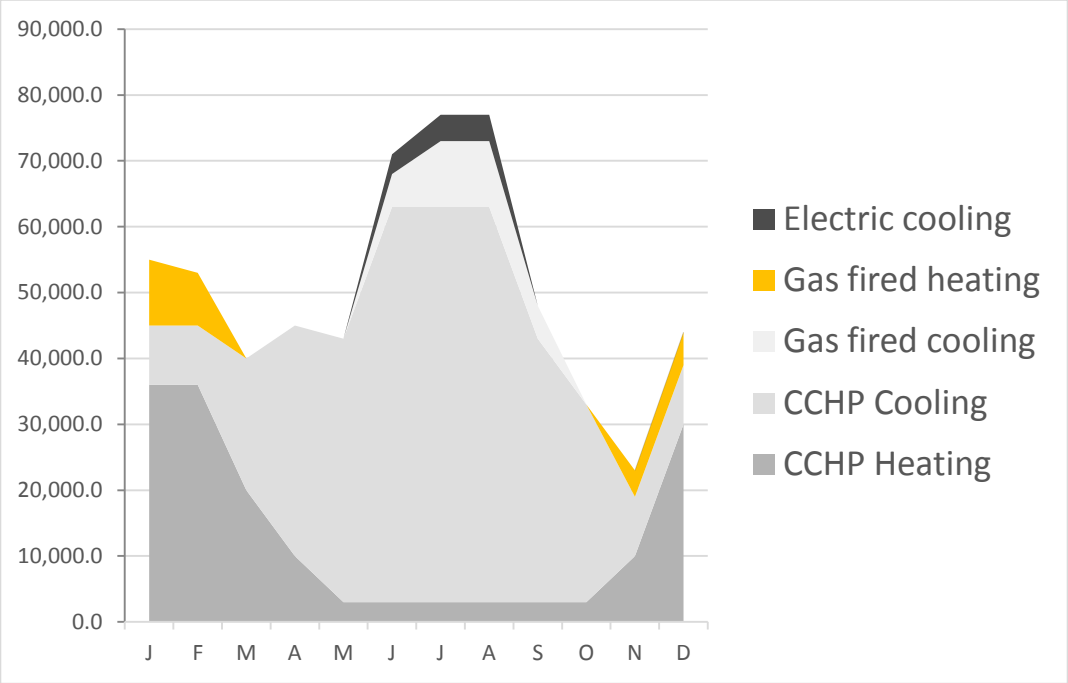

Figure VIII.C.16 - 2

Heating, Air Conditioning, and Ventilation (HVAC) System

Existing HVAC System

The HVAC system for the current Resort has an electric chiller with cooling tower and three (3) modular 200,000 BTUh gas boilers serving four pipe distribution systems. Domestic hot water for the current Resort is provided by a high-efficiency gas-fired boiler with hydrostore tanks and this is backed up with 90+ efficiency gas- fired -hi capacity hot water heaters.

New HVAC System

To meet the needs of both Phase I and Phase II, the HVAC system will be supplemented and enhanced by the addition of the following equipment. A diagram of the planned system and new components is illustrated on Figure VIII.C.16-3.

- Natural gas-fired Combined Cooling, Heat and Power (CCHP) central plant with absorption chiller, cooling tower and supplemental chiller and boiler. Variable speed hot water and chilled water pumps will be provided.

- The CCHP will be provided and operated via a Power Purchase Agreement (PPA) with ASI Energy of Ithaca, New York. ASI will apply to participate in NYSERDA's program promoting distributed generation in the State (NYSERDA PON 2568). A letter regarding the anticipated PPA is provided as Figure VIII.C.16-4.

- Modular rooftop air handling units (RTU's) with variable speed supply and return fans, economizer and demand-controlled ventilation control, energy recovery core or wheel, hot water heating and chilled water cooling coils and 30% filters. UV-C germicidal lamps will be provided for increased indoor air quality as well as reclamation of cooling coil condensate for use a make-up water for the cooling tower. A combination of single-zone and multi-zone units will be provided. VAV terminals and hot water reheat coils will be provided for multi-zone systems.

- Fan coils and air handling units (AHU's) will be used for the smaller spaces, which will be served by a new four pipe distribution system.

- Energy recovery ventilators (ERV's) will provide toilet room exhaust as well as conditioned ventilation air for corridors. Depending on horsepower, the ERV's may be provided with variable speed fans. Hot water heating and chilled water cooling coils will be provided for conditioning ventilation air.

- A new Energy Management system with Direct Digital Control (DDC) will be provided to serve all new HVAC and lighting equipment.

- Ductless split systems shall be provided for all Data, Electrical and Elevator Machine rooms.

- Hydronic cabinet heaters will be provided for entry vestibules, stairways and mechanical rooms, air conditioning will not be provided.

- Ventilation systems shall be provided for enclosed parking areas, carbon monoxide (CO) shall be monitored by the DDC system.

- The two levels of parking garage beneath the Casino will be below grade for most of the perimeter. A ducted air system will be provided with six (6) 24,000 cfm, in-line fans alternately for supply and exhaust. These fans will be controlled by a CO sensing system controlling fan speed to minimize fan energy use during times of light traffic.

- Kitchen ventilation and make-up air systems will be evaluated as the design progresses. Exhaust hoods with a perforated supply plenum is desirable to reduce make-up air heating and cooling requirements.

- The Central Plant will have redundancy as follows:

    - In Phase I, the back-up for the CCHP generator is NYSEG. After the Phase II generator is installed, it's estimated that NYSEG will only need to back up 40% of power demand.
    - A stand-by diesel generator will be installed to serve life safety loads.
    - A gas boiler will provide back-up heat and drive the second absorption chiller installed in Phase I. In Phase II, the gas boiler will serve exclusively as a back-up heat source.
    - A second absorption chiller will provide back-up cooling and peak load cooling.

Additional domestic hot water will be needed for Phase I toilet room lavatories, general sinks, and for kitchen food preparation and washing. For the hotel in Phase II, additional domestic hot water will be needed for hotel room toilet rooms, general toilet room lavatories, kitchen equipment, and laundry facilities. Additional energy needed to provide hot water for Phase I is estimated to be 384,000 BTUh. Additional energy needed to provide hot water for Phase II is estimated to be 2,900,000 BTUh.

Additional water heating needs will be met with a heat exchanger tank heated from the new CCHP system with back-up heating provided by two (2) high-efficiency gas-fired water heaters. Each of the heaters will be sized for 60% of the required hot water load in order to provide redundancy in the system. A hot water storage tank will be included to provide buffer in the system, thereby ensuring adequate supply for kitchen use. Two or three additional high-efficiency gas-fired water heaters will be installed to accommodate domestic hot water needs for Phase II.

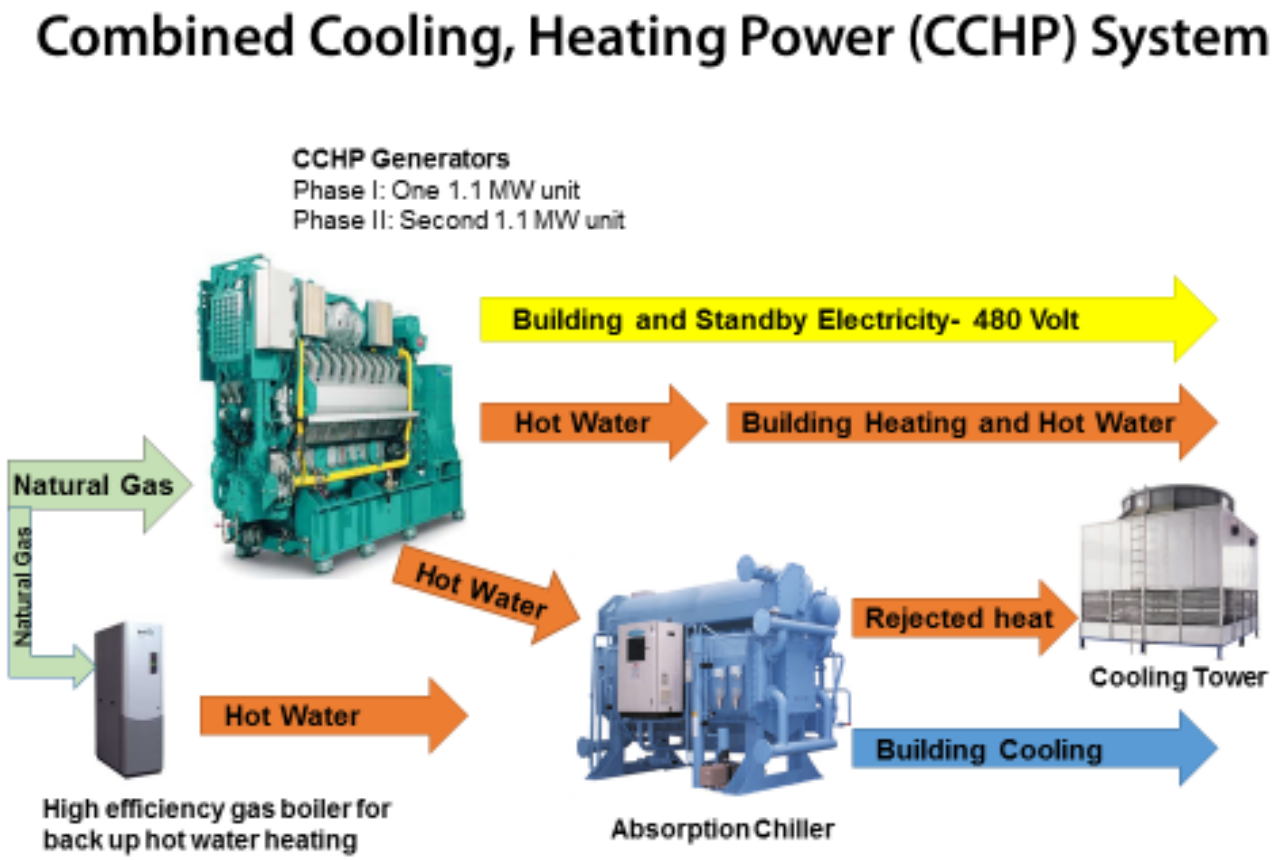

Figure VIII.C.16-3

The natural gas-fired generators will produce 1.1 mW each of 480 volt, three phase electricity. Heat recovery from the engine jacket and exhaust will create 190-degree hot water for building heating and domestic hot water. Recovered heat will also be used to drive two (2) 400-ton absorption chillers.

The heat removed from the building and the regeneration heat put into the absorpers will be rejected through the cooling tower.

In Phase I, the gas boiler will drive the second absorption chiller. In Phase II when the second CCHP unit will drive the second chiller, the gas boiler will provide a stand-by heat source.

ASI ENERGY
DEVELOPERS OF COMBINED HEAT & POWER AND MICROGRIDS

June 9, 2014

To Traditions Resort and Casino:

ASI Energy has developed a unique integrated project delivery system that delivers highly efficient and comprehensive CHP solutions. We utilize our extensive knowledge and experience in engineering design, construction management, utility regulatory policies, and power purchase agreements to provide a beneficial CHP system to you, the end user. We offer turnkey solutions from start to finish and are backed by well over $150m in investment capital.

ASI Energy has committed itself in full support of the Traditions at the Glen Casino Project. After careful consideration of the various prime mover power options, we believe that Combined Heat and Power (CHP) makes the most sense for the site. Our initial findings showed that by simply using CHP at Traditions, the Green House Gas (GHG) emissions reduction would be quite substantial. According to the US EPA CHP emissions calculators, the 1,000kW of power we would install at Traditions would have a combined total, from heating/cooling/power, of removing 9,273 cars or 2,649 homes...and that's each year. This is quite a substantial savings.

As a part of our involvement with project, we have offered to finance the prime movers and related cooling equipment as part of a Power Purchase Agreement (PPA) with Traditions. As part of our commitment to this project, we agree to work in good faith to determine the PPA that makes the most financial sense for Traditions. In the end, the PPA will: save you money and save the planet harmful GHG emissions.

Please do not hesitate to contact me with any questions. We look forward to being a part of this very exciting project.

Sincerely,

Herbert Dwyer
CEO
herbert.dwyer@asienergy.com

(607) 330-1203 ASIENERGY.COM 950 DANBY ROAD, SUITE 100F, ITHACA, NY 14850

Figure VIII.C.16-4

Plumbing System

Existing Water System

The site currently uses approximately 7,000 gallons of water per day. The Resort's existing domestic water and fire service is provided by a 100,000 gallon, below-ground water storage tank located on Resort property north of the facility. The water storage tank is filled by an on-site pump station that pumps water from the municipal water supply to the tank. The municipal supply water pressure was noted at 35 psi at an existing fire hydrant located between the main building and the parking lot.

Water supply from the storage tank serves the existing hotel/spa/restaurant, golf shop and the storage building as well as site fire hydrants. Water pressure from the storage tank was noted as 75 psi at a hydrant near the main building.

The size of the existing municipal water supply is a 6" main with a water meter/ reduced pressure zone (RPZ) pit located at Beech Street. The 6" municipal supply follows the entrance road up to a valve vault located near the hotel. The piping within the valve vault provides a 4" water supply to a pump station, and two (2) 7.5 H.P. booster pumps feed into an 8" main to/from the storage tank. The two pumps are controlled by floats in the storage tank. The 8" water supply with backflow connects to the hotel water supply from the storage tank. In addition, a 4" water supply at street pressure is shown on a utility plan to the hotel building. This is the back-up supply should the storage tank be out of order.

Planned Water Usage

Estimated water use for the Casino in Phase I is 38,000 gal/day above the Resort's existing 7,000 gal/day usage. Phase II use will increase use by approximately an additional 19,200 gal/day.

Since the municipal water supply has low residual pressure and cannot support fire flow at the Casino elevation, the existing 100,000 gallon storage tank will be used to meet the fire and domestic water demand of the new facilities. During a fire system demand for the existing building or for the Phase I Casino or Phase II hotel, the existing storage tank will be sufficient. Consequently, there will be no revisions made to the existing water system other than providing new water and fire service connections for both proposed construction phases.

To reduce water consumption at the new facility, low-flow water fixtures including faucets, showers, and dishwashers and dual-level flush valves will be utilized throughout.

Phase I: The proposed water consumption average hourly demand would be approximately 27 gpm based on occupant load factor and estimated fixture count plus the restaurant kitchen load factor.

The proposed fire protection system will be light hazard for the casino area and ordinary hazard for the parking garage levels. Using the ordinary hazard for the parking garage, the sprinkler design flow would be approximately 500 gpm.

With the existing storage tank water supply pressure at the building of 75 psi, no fire pump will be required. Based on National Fire Protection Association (NFPA) fire sprinkler system standard NFPA 13, the flow duration will be for 60 minutes = 30,000 gallons.

Phase II: Phase II will be a 160 bed hotel with four floors. The proposed water consumption average hourly demand would be approximately 101 gpm based on occupant load factor and estimated fixture count.

The proposed fire protection will have sprinkler protection throughout the building and will include a standpipe system due to the building height. It is expected that with the existing water pressure from the storage tank of 75 psi and with the hotel bedroom floors as light hazard, there will be no requirement for a fire pump. The standpipe system will be a manual wet system using fire department apparatus to provide system pressure as required by NFPA 14.

The largest fire protection demand would be for the standpipe system = 750 gpm for 30 minutes (NFPA 14 section 9.2 for class I standpipes) = 22,500 gallons.

Existing Sanitary Sewer System

The existing Resort has a 6-inch sewer line, which exits the south side of the building and goes down the hill to a sewer main running across the flat area in front of the Resort property. This is a new sewer line that was installed in 2013.

New Sanitary Sewer System

The existing new sewer main is adequate for flow rates from Phase I and Phase II facilities. Additional manholes will be provided and the sewer main will be re-routed to run beneath the parking garage.

Existing Natural Gas Service

Existing natural gas service to the Traditions Resort comes from Oak Street and is routed across the open field to a gas distribution vault located in front of the hotel. From this vault, the gas service has a separate gas supply to the hotel at the east end of the building and a separate gas supply routed between the hotel and the parking lot up to the club house.

Information about projected new natural gas load was provided to NYSEG in an application for additional gas service, which was submitted on May 2, 2014.

New Natural Gas Service

Phase I and Phase II facilities' combined natural gas use will increase gas load by an estimated 15,630 cubic feet per hour (cfh), with increased use in the following areas:

- Domestic hot water heating – 3,300 cfh
- Building heating – 3,200 cfh, taking into account the proposed CCHP system (without the system, increased building heating load would be 7,200 cfh)
- Generator – 9,130 cfh

To serve Phase I and Phase II facilities, the existing gas service and distribution vault must be upgraded by NYSEG. At the time of this writing, NYSEG has confirmed that it needs to increase gas main capacity to serve the Casino, and is currently in the process of determining details of the expansion and associated costs. To ensure reliable gas service to the existing facilities during construction, existing gas services to the hotel and club house will be re-routed to avoid construction areas.

Electrical System

Existing Electrical System

Electric service for the existing Traditions Resort is 4.8-kV service originating at Oakdale substation located in Johnson City, New York. The Oakdale substation is fed with one (1) source. Existing electric service enters the site from Beech Street via overhead distribution lines extending to the edge of the Resort's upper parking lot. From there, the 4.8-kV service travels underground from the utility riser pole to the east end of the existing hotel. Existing electric service is 600 amp, 480 volt, 3 phase service. In addition, the Resort has a 25 kilowatt diesel generator in the hotel for life safety loads.

New Electrical System

Electrical demand for the proposed Gaming Facility is estimated at 1.5 mVA for Phase I and the existing Hotel. Total additional electrical load will grow to approximately 2.1 mVA when Phase II is complete.

To provide safe and reliable electricity to the entire complex, including gaming and hotel facilities planned for Phase I and Phase II, the following improvements will be made to electric service.

- The Casino will be fed from an existing 12-kV overhead electric service located on Watson Boulevard. The electric service will be sized to accommodate, Phase I, Phase II and the existing Hotel. Phase II will be fed from the Casino electric service at a future date.

- The existing Hotel will be removed from the 4.8-kV service distribution that currently serves it, and the Hotel's load will be transferred to the Casino's electric system.

- The existing 12-kV overhead electric service available at Watson Boulevard is fed from the NYSEG Oakdale substation located in Johnson City, New York. The Oakdale substation is fed from two (2) separate transmission lines that are fed from two (2) different generating sources. This provides redundancy in the event of a loss of either transmission line, thus providing more reliable service.

- The existing 12-kV overhead electric service ends near the intersection of Watson Boulevard and Valley Plaza Drive in Johnson City, NY. NYSEG will extend the 12-kV service to the site by installing six (6) utility poles and 15-kV rated overhead conductors along Watson Boulevard to the corner of the property bounding Watson Boulevard. The exact location will be determined during design. The estimated cost to extend the 12-kV overhead electric service to the site is $150,000.

- A new 12-kV underground, concrete encased electric service will be installed underground from Watson Boulevard to a 15-kV rated, padmount switchgear installed outdoors near the proposed Casino. The estimated cost of the underground electric service is $100,000.

- A new 3,000-kVA padmount transformer will be located next to the padmount switchgear. The transformer will reduce the 12-kV to a 4,000A - 480Y/277V, 3-phase, 4-wire service for use within the proposed Casino.

- Prime power/cogeneration switchgear with utility/CCHP generator paralleling control will provide active synchronization and soft loading with the Utility grid to achieve optimum power and heat generation for the CCHP system. The switchgear will also provide NYSEG approved interconnecting protective relays.

- A new 4,000A rated switchboard will be located in the proposed Casino's main electrical room.

- The 4,000A rated switchboard will feed 480V distribution panels located throughout the proposed Casino. Major HVAC equipment, elevators and lighting will be serviced from the 480V electrical distribution.

- Step down transformers will be provided to reduce the voltage from 480V to 208Y/120V to feed general power and receptacle panelboards. General power and receptacle panelboards will be located throughout the building.

- Emergency loads (emergency lights, exit signs, elevators and the fire alarm system) will be fed from dedicated emergency power panel boards connected to a dedicated emergency automatic transfer switch and life safety rated 150 kW diesel generator.

- The existing Hotel will be re-fed from the proposed Casino's electric service.

Prime Power, Emergency Power, and Uninterruptible Power Supplies (UPS)

- Prime Power: To provide power for Phase I and Phase II facilities, two (2) 1.1-mW CCHP natural gas generators will be located in the mechanical room to provide continuous power and peak load shaving. Heat exchangers connected to the CCHP generators will recover the waste heat for use with the HVAC system. One 1.1-mW CCHP generator will be installed during Phase I, the second 1.1-mW CCHP generator will be installed at a later date when Phase II expansion gets underway.

    - The Phase I CCHP natural gas generator will provide 1.1-mW of continuous power to the proposed Casino and existing Hotel (estimated 1.5-mVA load).
    - The Phase II CCHP natural gas generator will provide an additional 1.1-mW of continuous power for the proposed Hotel (estimated 0.6-mVA load).

- Emergency Power: a 150-kW diesel generator with a sub-base fuel tank and sound attenuated and weatherproof enclosure will be located outdoors in the Mechanical Courtyard area to provide power to emergency loads (emergency lights, exit signs and the fire alarm system) in the event of a utility power failure. The sub-base fuel tank will provide enough capacity to run the emergency generator for 90 minutes. A separate emergency generator is required as the CCHP generators are not life safety rated. Emergency power will be sized to accommodate both Phase I and Phase II. Phase II will be fed from the Casino emergency power system at a future date.

- UPS's will be provided for all security/surveillance and data equipment.

Solar Photovoltaic Power (PV)

- Phase I will include installing 200 kW of PV power using fixed tilt solar panels installed on the roof of the proposed Casino. Solar PV power production is expected to be approximately 236,000 kwh per year.

- Traditions Resort and Casino LLC will sign a Solar Power Purchase Agreement (SPPA) with a solar service provider who will own, operate and maintain the PV system. A letter with further details of the anticipated SPPA is provided in Exhibit X.C.6 Renewable Energy.

- The solar service provider will act as the project coordinator, arrange financing, design the PV system, handle the permitting and the Utility interconnection agreement and construct the PV system.

- The solar system will include a kiosk in a public space of the Casino displaying the amount of electricity generated by the PV system.