

**DOCKETED**

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| <b>Docket Number:</b>   | 79-AFC-04C                                                                            |
| <b>Project Title:</b>   | Compliance - Application for Certification of DWR Bottlerock Geothermal Project       |
| <b>TN #:</b>            | 265383                                                                                |
| <b>Document Title:</b>  | Response to Data Requests Set No 1 – Bottle Rock Geothermal Power Plant (79-AFC-04C)  |
| <b>Description:</b>     | Response to Data Requests Set No. 1 – Bottle Rock Geothermal Power Plant (79-AFC-04C) |
| <b>Filer:</b>           | John C Casteel                                                                        |
| <b>Organization:</b>    | Mayacma Geothermal LLC                                                                |
| <b>Submitter Role:</b>  | Applicant                                                                             |
| <b>Submission Date:</b> | 8/8/2025 8:32:33 AM                                                                   |
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August 04, 2025

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Compliance, Monitoring and Enforcement Unit  
California Energy Commission

RE: Response to Data Requests Set No. 1 – Bottle Rock Geothermal Power Plant (79-AFC-04C)

Anwar,

On behalf of Bottle Rock Power, LLC and Open Mountain Energy (Mayacma Geothermal), please see responses to the CEC data requests dated July 8, 2025 regarding the Petition to Amend (PTA) the existing Bottle Rock Power Plant permit. The CEC requests clarification on the project description and additional information on proposed operations. We have addressed the data requests below, providing references to the relevant information in the PTA where appropriate. To expedite the resolution of these items, we would propose a meeting to review the CEC's questions, our responses and any aspects of the data requests that remain unclear in order to facilitate timely processing of the PTA.

#### **A. COMPLIANCE, MONITORING AND ENFORCEMENT UNIT**

##### **1. An updated Project Description that explains whether the proposed 7.5 MW is part of the existing BRPP 55 MW capacity or whether the proposed 7.5 MW is in addition to the existing CEC licensed 55 MW capacity**

BRP has proposed that the 7.5MWe binary power plant equipment is part of the existing 55 MWe permitted capacity. BRP is not currently proposing in this PTA to increase the permitted capacity above 55MWe. BRP's future plans to use advanced geothermal technologies would occur post installation and commissioning of the Mayacma equipment and would be addressed in a separate, future PTA. The existing 55 MWe of equipment installed from the previously operating steam power plant will remain in place and utilized to various extents in support of the 7.5MWe near-term repower, as well as to support the future advanced geothermal technology project; however, the technical specifications of that project are still to be defined and cannot be included in the current PTA. The proposed PTA for the 7.5MWe outlines the integration into existing BRP power plant infrastructure. Some modifications will be required by Mayacma to integrate the equipment that is specific to the smaller capacity of the ORC system, but it does not require altering the total permitted capacity of the BRP power plant facility. Some of the following responses below have been prepared given the above clarification that the total permitted capacity of the power plant will remain at 55 MWe, and that this PTA addresses only the installation and operation of the new generation equipment that will repower an initial 7.5Mwe of the 55 MWe total.

#### **B. COMPLIANCE, MONITORING AND ENFORCEMENT UNIT**

**The operation profiles for the proposed 7.5 MW Binary Geothermal project and the**

**existing 55 MW BRPP is not clear. The following are examples of the unclear nature of the operational profiles:**

**1. OME's proposed project change would involve shared use of some BRPP equipment.**

Refer to Sections 2.1 and 2.2 of the PTA that describe the 7.5MWe generating equipment and the list of existing BRP equipment/systems the 7.5MWe system will tie-into and integrate with. The 7.5MWe system does not require the remaining legacy generation unit (55 MWe steam turbine) to be in active service, nor prevent it from being placed in service at a future date.

**2. BRP would use the existing power plant infrastructure of the BRPP for the remaining geothermal production (up to 47.5 MW).**

Yes, BRP expects to utilize the existing and permitted power plant infrastructure of the BRPP to bring the entire site back up to 55MWe over time (including the proposed 7.5MWe system currently under PTA review), however that is not ready for permitting nor proposed at this time. The Mayacma project would not conflict with future addition of the advanced geothermal technology and is not dependent on the future advanced geothermal project to be implemented. The existing infrastructure/equipment has mutual beneficial use for the 7.5MWe partial repower, and future contemplated uses.

**3. The PTA proposes disconnecting the existing steam supply pipeline at the turbine generator building inlet, steam-stacking system, and rock muffler.**

OME/Mayacma will be installing pipe junctions and valving to allow steam bypass of the existing turbine building and the existing steam-stacking system/rock muffler to route the resource through new binary generating units. However, the existing bypassed equipment and piping could be readily placed back in service, pending future approved actions.

## **DATA REQUESTS**

**1. Since the CEC has to evaluate worst case environmental impacts, please provide clear operational profiles of the 7.5 MW Binary project and the 55 MW BRPP, including detailed description of how the two facilities could operate simultaneously to the maximum extent that the CEC's certification allows.**

The current PTA addresses only installation and operation of the 7.5 MWe capacity system and the impacts of the 7.5 MWe facility are fully analyzed in the PTA and compared to the operating permit limits and CEQA thresholds to demonstrate the project will not create new impacts. Pending development of currently undefined engineering details and specifications of a future advanced geothermal technology project, it is reasonable to foresee that the 7.5 MWe Mayacma project and a future contemplated 47.5 MW advanced geothermal technology project can operate simultaneously. Resources from the wellfield are easily divided proportionally to their respective generation units, and the entire facility will be able to produce the total 55 MWe congruently. No aspect of the 7.5MWe installation will preclude the future contemplated actions. This PTA discloses the environmental impacts based on the project as defined in the PTA for the 7.5MWe. As defined in the PTA, all impacts are less than those of the permitted capacity for the site.

**2. Would a second cooling tower be constructed to ensure that the 7.5 MW facility could operate independently without reducing the load from the 55 MW BRPP facility?**

No, the existing cooling tower capacity would not be altered, and can still meet, or exceed all future needs for a total of 55MWe geothermal power generation at BRPP as initially designed.

**3. If the proposed project change would add 7.5 MW to the existing 55 MW BRPP facility for a total of 62.5 MW, would any additional equipment (in addition to the new equipment for the 7.5 MW facility provided in the PTA) be needed?**

No, BRP is not proposing to increase the capacity above 55 MWe, nor would additional equipment be required.

**4. Would the use of some shared infrastructure (e.g., the Stretford system, cooling towers, pipelines, groundwater wells, etc.) prevent the facility from achieving 62.5 MW?**

See above responses. Shared use of facilities does not impact the combined facility from achieving 55 MWe in the future.

## **C. COMPLIANCE, MONITORING AND ENFORCEMENT UNIT**

**1. Provide a comprehensive review for both the 7.5 MW and the 55 MW BRPP facility under CEQA ensuring that all activities to achieve either scenario are analyzed.**

This PTA includes a comprehensive review of the integration and operation of the 7.5MWe facilities with the existing infrastructure that is currently proposed, and all environmental aspects required by the CEQA process have been addressed in the PTA. As stated previously, the Mayacma project is not dependent on the future and as yet undefined advanced geothermal project to be implemented and thus CEC does not need to evaluate both projects as part of this PTA.

Regards,



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