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May 31, 2005

WEC 2005-039

Lance Shaw
Compliance Project Manager
02-AFC-4C
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**RE: ADMENDMENT TO SOIL & WATER-5: WALNUT ENERGY CENTER
AUTHORITY, WALNUT ENERGY CENTER, SUBMITTAL OF
ADDITIONAL INFORMATION**

Dear Mr. Shaw:

On May 24, 2005, the Walnut Energy Center Authority (WECA) submitted a petition for amendment to modify Condition of Certification Soil & Water-5. On May 26, 2005, a meeting was held with the California Energy Commission (CEC) and WECA to discuss the amendment. As a result of the meeting, WECA has modified the language to Condition of Certification Soil & Water-5 by removing a sentence pertaining to the operation of groundwater wells. Revised language to Soil & Water-5 is attached.

At the meeting, the CEC Staff also had a question regarding the headings in Table 4 of the amendment petition. Specifically, the Staff requested that the Table headings be revised to reflect the specific parameter values used in the sensitivity testing of the groundwater model. A revised Table 4 is attached.

Lastly, the CEC questioned how the shallow and upper aquifers were modeled. The shallow and upper aquifers were modeled as a composite. The vertical hydraulic conductivity was selected specifically to reflect the resistance resulting from the presence of the shallow aquitard.

Lance Shaw
June 2, 2005
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Should you have any questions, please do not hesitate to contact Susan Strachan at 530-220-7038 or me at 916-447-2166.

Sincerely,

Jeffery D. Harris
Ellison, Schneider and Harris L.L.P.
Attorneys for WECA

Attachment

SOILS & WATER-5: The project's water use shall be limited as described below. For purposes of this condition, the bridge period is defined as that period of time between the commencement of commercial operation of the WEC and the earlier of December 31, 2006 or when recycled water from the City of Turlock's wastewater treatment plant (WWTP) is available to the WEC.

Water for construction purposes shall consist of groundwater provided from the existing TID well at the Walnut substation. Potable water may also be used for construction for the purpose of hydrostatic testing and flushing of equipment, pipes and tanks; provided however, the project owner shall minimize the use of potable water for this purpose to the maximum extent feasible.

During the bridge period, water used for cooling and steam cycle make-up shall consist of poor quality groundwater from the upper aquifer supplied from either one of two or more groundwater wells located on either the 69-acre parcel that includes the 18-acre WEC project site (the "69 Acre Parcel") or the two 100% wells located on the TID equipment storage area on South Washington Road (the "South Washington" site). ~~Only one of the two groundwater wells may operate at one time (with the other well location serving as a 100 percent redundant backup).~~ Total combined ~~G~~groundwater production from all of the wells on both the 69 Acre Parcel and the South Washington site shall not exceed two million gallons per day or 1,800 afy.

Water for operational and landscaping purposes used after the bridge period shall consist of recycled water from the City of Turlock WWTP and shall not exceed 1,800 afy. Water for domestic needs ~~after the bridge period~~ shall consist of potable water provided by the City of Turlock and shall not exceed 3 afy. Groundwater from the wells to be located ~~either~~ on the ~~WEC project site~~ 69 Acre Parcel or the South Washington site may also be used for back-up to the recycled water supply in the event of a short-term disruption in service and shall not exceed 51 afy.

Groundwater from the wells to be located ~~either on the WEC project site~~ 69 Acre Parcel or the South Washington site may also be used in the event that recycled water is not available to the project subject to the provisions of **SOILS&WATER-6**. Alternative water use shall be calculated using a 5-year rolling average.

Verification: The project owner shall notify the Commission no later than May 31, 2006, and in monthly compliance reports thereafter, as to the status of recycled water production by the City of Turlock's WWTP until the WEC is using tertiary treated, recycled water for its non-potable operational and landscaping requirements. This notice shall include information on the issues related to recycled water production, DHS approval for recycled water service and the expected availability of recycled water supplies to WEC. After recycled water service is provided to WEC, the project owner shall report water use to the Commission as required by **SOILS&WATER-7**. Annual average water use shall be calculated using a 5-year rolling average of actual water use starting with the first year of operation. In the event of an interruption or reduction in recycled water service that requires the use of groundwater from the wells to be located ~~either on the WEC project site~~ 69 Acre Parcel or the South Washington site, the project owner shall notify the CPM, in writing, within 24 hours.

**Table 4. Sensitivity of Drawdown to Aquifer-Parameter Values
(Feet)**

Parameter	Drawdown for Baseline		Drawdown with 50% Parameter Value		Drawdown with 200% Parameter Value	
	Distance 0.5 Miles	Distance 2.0 Miles	Distance 0.5 Miles	Distance 2.0 Miles	Distance 0.5 Miles	Distance 2.0 Miles
Horizontal hydraulic conductivity	5.0	1.9	8.4	2.5	3.0	1.3
Vertical hydraulic conductivity	5.0	1.9	5.2	2.0	4.9	1.9
Specific storage	5.0	1.9	5.1	2.0	4.9	1.8
Specific yield	5.0	1.9	5.7	2.5	4.4	1.4