

DOCKETED	
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Project Title:	Elmore North Geothermal Project (ENGP)
TN #:	253191
Document Title:	Elmore North Geothermal Project Data Request Response Set 1 (Revised Responses to Data Requests) Notice Letter to ICAPCD
Description:	N/A
Filer:	Lindsey Xayachack
Organization:	Jacobs
Submitter Role:	Applicant Consultant
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Docketed Date:	11/17/2023



Elmore North Geothermal LLC
4124 NW Urbandale Drive
Urbandale, IA 50322

Jon Trujillo
General Manager, Geothermal Development

November 14, 2023

Mr. Jesus Ramirez
APC Division Manager
Imperial County Air Pollution Control District
150 South Ninth Street
El Centro, California 92243

RE: Notification for Permit Application to Construct for the Elmore North Geothermal Project, Imperial County, California

Dear Mr. Ramirez:

Elmore North Geothermal LLC (the Applicant), an indirect, wholly owned subsidiary of BHE Renewables, LLC, submitted an Imperial County Air Pollution Control District (ICAPCD) Authority to Construct (ATC) Application for the Elmore North Geothermal Project (ENGP) on April 27, 2023. This application was submitted to ICAPCD in conjunction with an Application for Certification (AFC) that was filed with the California Energy Commission (CEC) on April 18, 2023¹.

As part of its review of the ATC Application, ICAPCD issued an information request on September 29, 2023 for the ENGP. The Applicant responded to each of the specific information requests issued by ICAPCD on October 4, 2023, and November 10, 2023. Updated air quality emission estimates, air quality impact analyses, and health risk assessment modeling were submitted to ICAPCD as part of the response provided on November 10, 2023.

Recent updates have been made to the ENGP design which were not able to be incorporated into the revised analyses submitted on November 10, 2023. Specifically, the location and orientation of the offsite wells and associated well pads have shifted and the number of injection wells was reduced by one. A figure showing the latest ENGP well design layout is included as Attachment A.

These minor layout changes only pertain to offsite emission sources with limited operation and the number of offsite wells has decreased. Therefore, the emission estimates, air quality impact analyses, and health risk assessment modeling submitted to ICAPCD on November 10th are considered to be conservative as well as representative of the updated ENGP design. For these reasons, the Applicant will not be submitting revised analyses for the updated ENGP design.

The Applicant looks forward to working with the ICAPCD during its ongoing review of the ATC Application for the ENGP. Please contact Anoop Sukumaran at (760) 348-4275 (email address: Anoop.Sukumaran@calenergy.com) or Andrew Dunavent at (707) 372-7810 (email address: Andrew.Dunavent@jacobs.com) if you have any questions or if you need additional information.

¹ The CEC's website for the ENGP proceeding is available at <https://www.energy.ca.gov/powerplant/steam-turbine/elmore-north-geothermal-project-engp>.



Elmore North Geothermal LLC
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Urbandale, IA 50322

Jon Trujillo
General Manager, Geothermal Development

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jon Trujillo', written over a light blue horizontal line.

Jon Trujillo
General Manager, Geothermal Development

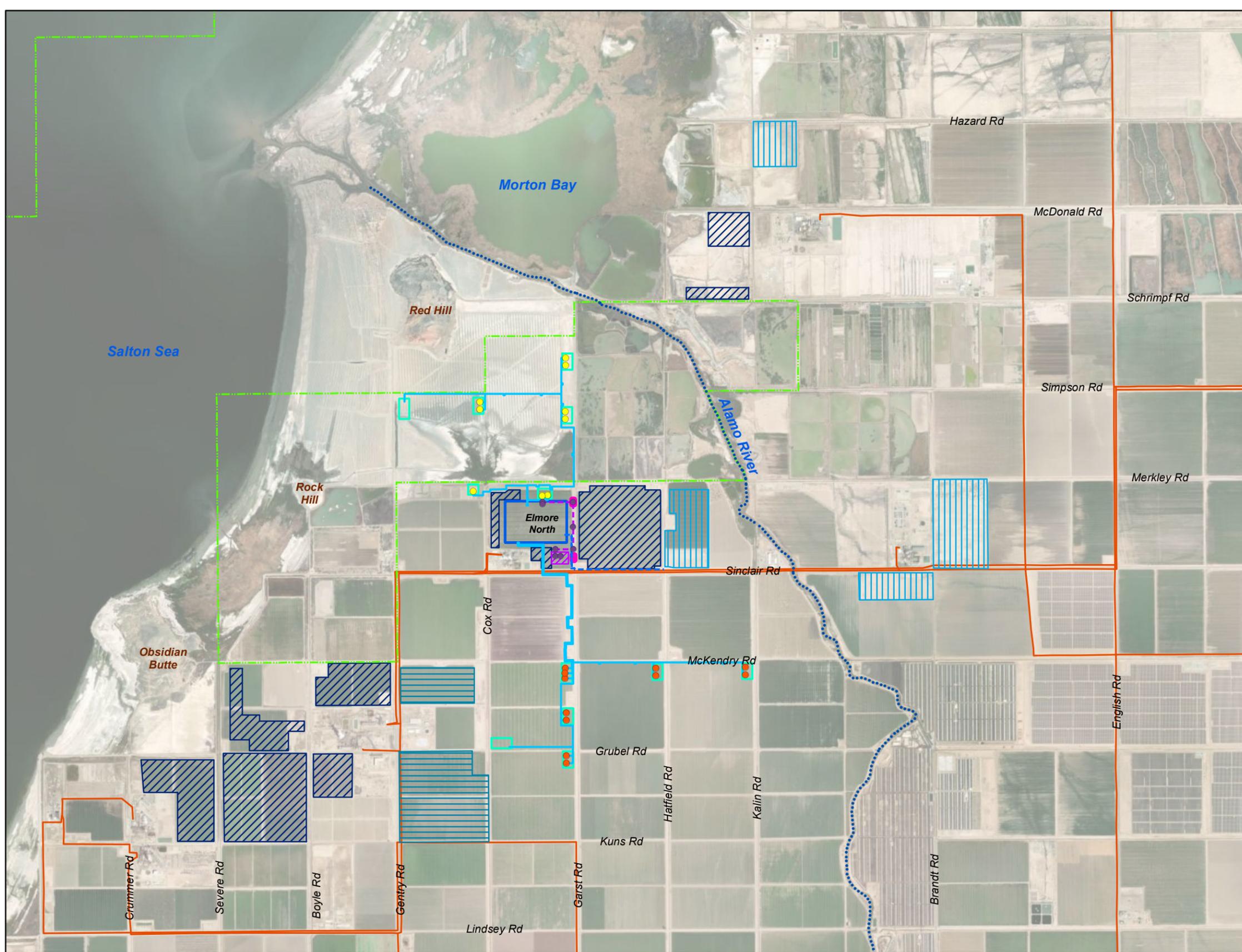
cc: Anoop Sukumaran/BHE Renewables
Jerry Salamy/Jacobs
Andrew Dunavent/Jacobs
California Energy Commission



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Attachment A: Revised ENGP Well Layout



- Legend**
- Plant
 - Well Pad
 - Injection Well
 - Production Well
 - Pipeline
 - Water Supply Pipeline
 - Gen-Tie Line Pole
 - Gen-Tie Line
 - Pull Site
 - Switching Station
 - Borrow Pit
 - Construction Camp
 - Construction Laydown and Parking Areas
 - Existing Transmission/Distribution Power Lines
 - Sonny Bono Salton Sea National Wildlife Refuge

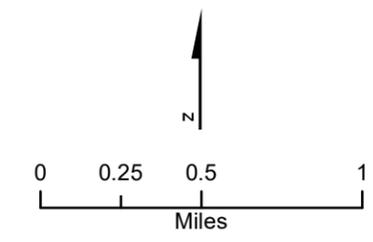


Figure 1-4R
Project Location
Elmore North Geothermal Project
 Imperial County, California