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November 22, 2023

Jon Trujillo
GM, Geothermal Development
BHE Renewables
74-710, CA-111, # 102
Palm Desert, California 92260

Data Requests Set 3 for Black Rock Geothermal Project (23-AFC-03)

Dear Jon Trujillo:

Pursuant to Title 20, California Code of Regulations, section 1716, California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 3, which is necessary for a complete staff analysis of the Black Rock Geothermal Project (BRGP) under the Warren-Alquist Act and California Environmental Quality Act.

Responses to the data requests are due to staff within 30 days. If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send written notice to me and the Black Rock Geothermal Project AFC Committee within 20 days of receipt of this letter. Such written notification must contain the reasons for not providing the information, the need for additional time, or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please email me at eric.veerkamp@energy.ca.gov.

_____/S/_____

Eric Veerkamp
Project Manager

Enclosure: Data Requests Set 3

CULTURAL AND TRIBAL CULTURAL RESOURCES

Author: Gabriel Roark

BACKGROUND: REQUIRED ACTIVITIES FOR PERMANENT CLOSURE

The Application for Certification (AFC) states that the applicant would prepare a detailed permanent closure plan 12 months prior to decommissioning to include:

- Identification of closure activities
- A discussion of relevant laws, ordinances, regulations, and standards (LORS), and actions necessary to conform to LORS
- Plans for recycling and disposing of materials generated during decommissioning
- Plans for site security
- Standards for well closure
- Standards for closing brine ponds (Jacobs 2023a, page 2-49.)

To provide a comprehensive impact assessment under the California Environmental Quality Act, staff requires additional information about permanent power plant closure, as specified below.

DATA REQUESTS

1. Please describe how you anticipate handling the concrete foundations of demolished buildings and structures. For example, would decommissioning crews remove the foundations altogether, grind the foundations to finished (post-decommissioning) grade, or leave the foundations in place?
2. What are the anticipated physical activities required to close the various wells associated with the Black Rock Geothermal Project (BRGP)?
3. What are the anticipated physical activities required to close the brine pond and other surface impoundments associated with the BRGP?
4. Describe the anticipated closure activities associated with underground utilities associated with the BRGP.

BACKGROUND: RELOCATION OF THE MORTON BAY POWER PLANT AND SHARED PROJECT FEATURES

The applicant indicated that it is redesigning the layout of the proposed Morton Bay Geothermal Project (MBGP) so that the power plant itself would be situated about 915 feet south/southwest of its original, proposed location (Jacobs 2023bb page 5-6). The relocated MBGP power plant would be within one of the construction laydown and parking areas identified for use during construction of the proposed BRGP, ENGP, and MBGP (Jacobs 2023a, Figures 1-4, 5.3-1a).

DATA REQUESTS

5. With the relocation of the MBGP power plant site, would the former power plant site be available for use as a construction laydown and parking area for construction of the BRGP?
6. If the former MBGP power plant site would not be available for use as a construction laydown and parking area for construction of the BRGP, is one or more alternative construction laydown and parking area necessary to replace it?

REFERENCES CITED

Jacobs 2023a – Jacobs (TN 249752). Black Rock Geothermal Project Application for Certification, Volume 1, dated April 18, 2023. Available online at: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-AFC-03

Jacobs 2023bb – Jacobs (TN 252491-1). Morton Bay Geothermal Project Data Request Response Set 1, Part 1, dated October 2, 2023. Available online at: https://efiling.energy.ca.gov/GetDocument.aspx?tn=252491-1&DocumentContentId=87526

EFFICIENCY AND ENERGY RESOURCES

Author: Ardalan Sofi

BACKGROUND: PROJECT LIFESPAN

Throughout the AFC, there are inconsistencies regarding the project's lifespan. In several sections of the AFC, the expected project lifespan is indicated as 40 years (TN 249752, Sections 2.1, 2.3.5.1). Yet, in one other section of the AFC, the expected project lifespan is projected to be 30 years (TN 249752, Section 5.9.3.4.1).

For staff to complete the preliminary staff assessment for this project, staff needs clarification on the expected lifespan of the project.

DATA REQUEST

7. Please clarify whether the project's expected lifespan is 30 years or 40 years.

LAND USE, AGRICULTURE, AND FORESTRY

Author: Andrea Koch

BACKGROUND: BORROW SITES

The application shows in Figure 5.11-2 that some of the potential borrow sites are on areas designated by the Farmland Mapping and Monitoring Program as Important Farmland, including Prime Farmland. Section 5.11.2.2.7 of the application discusses the restoration of borrow pits after excavation with the original topsoil to preserve the soil

characteristics of the borrow pit sites. However, avoiding any disturbance of this land is preferable in terms of agricultural impacts.

DATA REQUEST

8. To avoid disturbance of Important Farmland, is it possible to relocate the borrow pits to sites not designated as Important Farmland, especially Prime Farmland? Please discuss whether this is possible, and if not, state the reasons why.

BACKGROUND: RECONFIGURATION TO AVOID PRIME FARMLAND

The application shows in Figure 5.11-2 that the northwest corner of the project plant site is designated as Prime Farmland by the Farmland Mapping and Monitoring Program. Prime Farmland is considered the highest quality for farming.

DATA REQUEST

9. Is it possible to reconfigure the project components on the plant site to avoid or minimize the permanent conversion of Prime Farmland? Please discuss whether this is possible, and if not, state the reasons why.