

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-AFC-03
<b>Project Title:</b>	Black Rock Geothermal Project (BRGP)
<b>TN #:</b>	259003
<b>Document Title:</b>	BRGP-ENGP-MBGP_2024-09-04 _CalGEM Comments to PSAs
<b>Description:</b>	N/A
<b>Filer:</b>	Jerry Salera
<b>Organization:</b>	CA Dept. of Conservation Geologic Energy Management Division
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	9/4/2024 5:27:24 PM
<b>Docketed Date:</b>	9/5/2024



September 4, 2024

Mr. Eric W. Veerkamp  
Project Manager, STEP Division  
California Energy Commission  
Docket Unit  
715 P Street  
Sacramento, CA 95814

Dear Mr. Veerkamp,

Re: PRELIMINARY STAFF ASSESSMENTS FOR BLACK ROCK (DOCKET NO. 23-AFC-03),  
ELMORE NORTH (DOCKET NO. 23-AFC-02), AND MORTON BAY (DOCKET NO. 23-AFC-01)  
GEOTHERMAL PROJECTS

The California Geologic Energy Management Division (CalGEM) welcomes the opportunity to review the Preliminary Staff Assessments (PSA) prepared by the California Energy Commission (CEC) to evaluate the potential environmental effects of the construction and operation for the proposed Black Rock Geothermal Project (BRGP), published on July 11, 2024, the proposed Elmore North Geothermal Project (ENGP), published on June 13, 2024, and the proposed Morton Bay Geothermal Project (MBGP), published on June 27, 2024.

Chapter 4 of Division 3 of the Public Resources Code (PRC) and Title 14 of the California Code of Regulations (CCR) set out requirements for geothermal wells and associated projects. Any party wishing to modify existing geothermal wells or drill or complete new wells should comply with requirements stated therein, including but not limited to, bonding, notification, drilling, reworking, abandonment, and permitting requirements.

We would like to offer the following comments:

1. The PSAs for BRGP (Page 5.16-10), ENGP (Page 5.16-10), and MBGP (page 5.15-10, misnumbered page likely meant to be 5.16-10) incorrectly identify the project injection wells as "Class II" injection wells. While wells associated with oil and gas projects are regulated as Class II wells, because these are injection wells associated with geothermal projects, they are regulated by CalGEM as "Class V" injection wells.
2. The PSAs for BRGP, ENGP, and MBGP also incorrectly state or imply that CalGEM regulates, or issues permits for geothermal pipelines. While CalGEM has authority to regulate pipelines attendant to oil and gas, CalGEM does not regulate, or issue permits for geothermal pipelines based on the authority found in PRC sections 3700 to 3776. References to pipelines may be found at:

California Energy Commission

September 4, 2024

Comments for Docket Nos. 23-AFC-01, 23-AFC-02, 23-AFC-03

- A. BRGP PSA
  - a) Land Use, Agriculture, and Forestry pages 5.8-1, 5.8-2, 5.8-26
  - b) Water Resources page 5.16-1
- B. ENGP PSA
  - a) Land Use, Agriculture, and Forestry pages 5.8-2, 5.8-26
  - b) Water Resources page 5.16-1
- C. MBGP PSA
  - a) Land Use, Agriculture, and Forestry pages 5.8-1, 5.8-2, 5.8-27, 5.8-28
  - b) Water Resources page 5.15-1 (misnumbered page likely meant to be 5.16-1)

Based on the information provided within the PSAs, all three projects lie within the Salton Sea Geothermal Field. In addition, the MBGP is located to the south of the Imperial Carbon Dioxide Gas Field and there are carbon dioxide gas wells located to the immediate north of the MBGP. CalGEM recommends that within the PSA conditions of approvals, if any geothermal, oil, or gas wells, including any plugged, abandoned, or unrecorded wells, are damaged or uncovered during construction operations for any of the proposed projects, CalGEM must be contacted as soon as possible.

If you have any questions, please contact me at [jerry.salera@conservation.ca.gov](mailto:jerry.salera@conservation.ca.gov).

Sincerely,

*Jerry Salera*  
Jerry Salera

Senior Oil and Gas Engineer (Supv.)