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Response to Workshop Follow Up: Informal Data Request Set 1

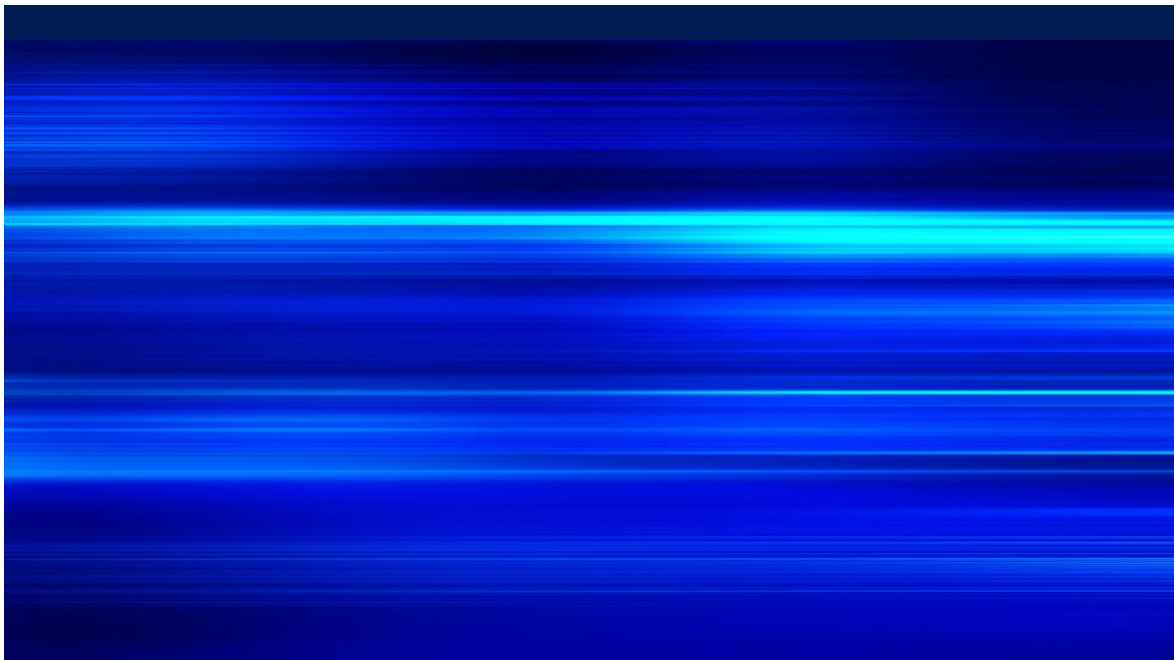
Submitted to
California Energy Commission

Prepared by
Black Rock Geothermal LLC

With assistance from
Jacobs

Black Rock Geothermal Project (23-AFC-03)

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Introduction

Attached are the responses from Black Rock Geothermal LLC¹ to the California Energy Commission (CEC) Staff's *Workshop Follow Up: Informal Data Request Set 1*, regarding the Application for Certification (AFC) for the Black Rock Geothermal Project (BRGP; 23-AFC-03)².

New or revised graphics or tables are numbered in reference to the Informal Data Request number. For example, the first table used in response to Informal Data Request 28 would be numbered Table IDRR28-1. The first figure used in response to Informal Data Request 28 would be Figure IDRR-1, and so on. Figures or tables from the BRGP AFC that have been revised have a "R" following the original number, indicating a revision.

Additional tables, figures, or documents submitted in response to an informal data request (for example, supporting data, stand-alone documents such as plans, folding graphics, etc.) are found at the end of each discipline-specific section and are not sequentially page numbered consistently with the remainder of the document, though they may have their own internal page numbering system.

¹ An indirect, wholly owned subsidiary of BHE Renewables, LLC ("BHER").

² TN#: 259518

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Acronyms and Abbreviations

AFC	Application for Certification
BMP	Best Management Practice
BRGP	Black Rock Geothermal Project
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
dBA	A-weighted decibels
IDRR	Informal Data Request Response
IID	Imperial Irrigation District
USFWS	U.S. Fish and Wildlife Service

1. Biological Resources

Background: Water Supply Assessment

Informal Data Request:

1. CEC staff informally requested the following additional information:
 - Impacts to listed species due to fallowing of agricultural fields (short term during construction and long term due to construction of the 3 facilities).
 - Associated mitigation measures.

Response 1: The acreage of temporary and permanent impacts to agricultural land cover types are provided for each site (TN 258977). The BRGP has 773.99 acres of temporary disturbance and 96.72 acres of permanent disturbance to agricultural land cover. The BRGP site parcel received approximately 348 acre-feet of water per year of irrigation water. Assuming approximately 34 percent of the applied irrigation water resulted in drainage to the Salton Sea, that would result in approximately 118 acre-feet of water flowing to the Salton Sea.

Temporary disturbance to agricultural land may be reverted back to agricultural production post-construction. Permanent impacts (from approximately six to 110 acres) are a relatively small areas in comparison to the over 500,000 acres total agriculture in Imperial County (USDA 2017). The permanent project site will result in 55 acres of the site to no longer be used for agriculture. Therefore, the amount of water currently/historically used by the parcel is assumed to be reduced to zero.

Reference

U.S. Department of Agriculture (USDA). 2017. 2017 Census of Agriculture Imperial County California. Accessed at:
https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/County_Profiles/California/cp06025.pdf

Background: Schedule/Duration of Night Work

Informal Data Request:

2. CEC staff informally requested the following additional information:
 - Anticipated # days, hours of work, etc.

Response 2: The anticipated day and night shift hours are provided below. Note that these shift hours are subject to adjustment based on factors such as temperature, weather, and potential Project Labor Agreement terms. The intent is to conduct night shifts year-round (excluding Sundays).

During Construction - Up to 316 days are anticipated per year.

- Monday – Saturday
 - Day shift: Start at 4:00 am (± 2 hours), end at 2:30 pm (± 2 hours)
 - Night Shift: Start at 3:00 pm (± 2 hours), end at 1:30 am (± 2 hours)
- Sunday/Holiday

- No Sunday or Holiday work is anticipated, except during production and injection well drilling, which will occur for approximately two-weeks straight, or other specialized work.

During Commissioning

- Monday – Sunday
 - Day shift: Start at 4:00 am (± 2 hours), end at 2:30 pm (± 2 hours)
 - Night Shift: Start at 3:00 pm (± 2 hours), end at 1:30 am (± 2 hours)