

**DOCKETED**

<b>Docket Number:</b>	23-AFC-03
<b>Project Title:</b>	Black Rock Geothermal Project (BRGP)
<b>TN #:</b>	261277
<b>Document Title:</b>	Letter re MBGP, ENGP, and BRGP from Imperial County Planning & Development Services
<b>Description:</b>	Letter re: Geothermal Pipelines and First Point of Interconnection
<b>Filer:</b>	Marichka Haws
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
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# Imperial County Planning & Development Services Planning / Building

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January 23, 2025

**Jim Minnick**  
DIRECTOR

Mr. Eric Veerkamp  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

RE: Geothermal Pipelines and First Point of Interconnection

Dear Eric:

Per our conversation held on January 10, 2025, the County of Imperial (County) acknowledges that the California Energy Commission (CEC) has the jurisdictional control of the geothermal pipelines to and from the geothermal power plant and the first point of interconnection with the geothermal wells. While the (County) has jurisdiction over the geothermal well field, geothermal wells (extraction and injection) along with all pipelines beyond the first point of interconnection.

“The CEC has offered to delegate to the County, construction and operational oversight and monitoring consistent with the County’s existing geothermal pipeline programs and the construction conditions of certification. This delegation will cover the pipeline segments running from the site boundary to the last production well and from the site boundary to the first injection well. The CEC would retain construction and operational oversight for pipelines located on the generating site within the fence line. Staff believes this approach facilitates an efficient compliance process given the County’s geothermal expertise from decades of overseeing geothermal resource pipelines and provides the applicant with consistency due to the County’s existing oversight.”

The County agrees with this assessment and accepts the delegation of CEC’s jurisdictional pipeline segment of the overall geothermal operational system. The County will add the CEC geothermal pipeline segments for each of the three proposed BHE geothermal facilities; to its construction and operational oversight and monitoring consistent with the County’s existing geothermal pipeline program.

Should you have any questions, please contact me directly, either at [jimminnick@co.imperia.ca.us](mailto:jimminnick@co.imperia.ca.us) or at (442) 265-1736 ext. 1776.

Sincerely,



Jim Minnick, Director  
Imperial County Planning & Development Services Dept.

CC: John Gay, Director of Imperial County Public Works Dept.  
Jon Trujillo, GM General Development BHER  
Michael Abraham, Assist. Director IC Planning & Development

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