

DOCKETED

Docket Number:	79-AFC-04C
Project Title:	Compliance - Application for Certification of DWR Bottlerock Geothermal Project
TN #:	262318
Document Title:	2024 Mayacma CEC Annual Compliance Report
Description:	2024 Mayacma CEC Annual Compliance Report
Filer:	John C Casteel
Organization:	Mayacma Geothermal LLC
Submitter Role:	Applicant
Submission Date:	3/24/2025 4:17:05 PM
Docketed Date:	3/24/2025



**2024 ANNUAL CALIFORNIA ENERGY COMMISSION
INTERIM CONDITIONS OF COMPLIANCE REPORT**

**BOTTLE ROCK POWER, LLC
GEOTHERMAL FACILITY**



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

TABLE OF CONTENTS

1.0 Introduction.....	3
2.0 Verification of Conditions of Compliance.....	3
3.0 Attachments	26

LIST OF ATTACHMENTS:

Appendix 1:	Interim Conditions of Compliance
	Compliance Matrix
	Annual Energy Facility Compliance Fee - Proof of Payment
Appendix 2:	Renewed LCAQMD ATC's and PTO's
	GAMP Participation – Proof of Payment
Appendix 3:	Figure 1 - Vegetation Monitoring Map
	Table 1 - Vegetation and Soil Boron Analytical Results
	Vegetation and Soil Boron Analytical Reports
	Figure 2 - Water Monitoring Map
	Table 2 - Groundwater and Surface Water Analytical Results
	Groundwater and Surface Water Analytical Reports



2024 CEC ANNUAL COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

1.0 Introduction

This report presents the 2024 compliance verification results for the Bottle Rock Power, LLC geothermal facility located at 7385 High Valley Road in Cobb, California.

The Bottle Rock Power, LLC facility suspended operations on March 31, 2015. Clean Energy Partners, LLC acquired 100% of the equity ownership interest in BRP Holdco, LLC on November 20, 2015, but the actual ownership of the Facility did not change. BRP continued to own the Facility on November 20, 2015. On March 23, 2023, the California Energy Commission (CEC) approved a change in operational control of the facility to Mayacma Geothermal LLC (Mayacma). Mayacma is responsible for daily compliance with the Interim Conditions of Certification for the non-operational status of the Facility.

This verification is conducted in accordance with the Interim Conditions of Certification summarized in the CEC letter addressed to BCEP on January 28, 2016. In this letter, energy commission staff determined which of the original Conditions of Compliance (COC's) were applicable during BRP's non-operational status. For ease of reference, this Letter is attached as Appendix 1; and the below report re-states the line-item detail of the applicable COC's found in the CEC Decision on the Petition to Amend the Conditions of Certification for the Bottle Rock Geothermal Power Plant, Docket 79-AFC-04C.

2.0 Annual Verification of Interim Conditions of Compliance

COM-1 Unrestricted Access

The project owner shall ensure that Energy Commission staff, and delegated agencies or consultants have unrestricted access to the facility site and the records maintained on-site.

The Bottle Rock Power, LLC geothermal power plant has been off-line since March 2015. There are no longer any employees, and the building is no longer in active use. The facility doors, perimeter fencing, and access road gates are all locked and secured. A caretaker is contracted to periodically visit and inspect the grounds or accompany any scheduled agency site inspections.

COM-2 Compliance Record

The project owner must maintain copies of all project files and submittals.

Mayacma maintains copies of all project files and submittals, in either hard-copy, electronic PDF, or both.



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

COM-3 Compliance Verification Submittals

The project owner is responsible for the content and delivery of all verification submittals to the Compliance Project Manager (CPM).

Mayacma acknowledges that they are responsible for the content and delivery of all verification submittals to the CPM.

COM-5 Compliance Matrix

The project owner must submit a compliance matrix to the CPM with each Annual Compliance Report.

A one-year compliance matrix is included with this report in Appendix 1.

COM-6 Monthly Compliance Report/Key Event List

During project initiation, construction or closure the project owner will submit a Monthly Compliance Report.

Mayacma recognizes that in the event of re-purposing or closure of the project, Monthly Compliance Reports will be submitted to the CPM during construction or closure activities.

COM-7 Annual Compliance Report

After construction is complete the project owner must submit Annual Compliance Reports instead of Monthly Compliance Reports. Annual Compliance Reports are due for each year of commercial operation and may be required for a specified period after decommissioning to monitor closure compliance.

Mayacma recognizes that Annual Compliance Reports are due for each year of commercial operation and may be required for a specified period after decommissioning to monitor closure compliance. Although the Bottle Rock Power, LLC facility was not in commercial operation in 2024 the intention is to seek opportunities to repurpose the facility as an energy production facility and not decommission the project. This annual report for 2024 has been prepared for submittal to the CPM with the intention to continue to pursue productive options for the project.



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

COM-9 Annual Energy Facility Compliance Fee

Pursuant to the provisions of Section 25806(b) of the Public Resources Code, the project owner is required to pay an annually adjusted compliance fee.

The Annual Energy Facility Compliance Fee of \$35,629, was paid by Mayacma to the CEC on July 11, 2024. A copy of this proof of payment is included in Appendix 1.

COM-10 Amendments, Ownership Changes, Staff-Approved Project Modifications, and Verification Changes

The project owner must petition the Energy Commission pursuant to Title 20, California Code of Regulations, section 1769, to modify the design, operation, or performance requirements of the project, or to transfer ownership or operational control of the facility.

Mayacma acknowledges this condition. A Petition to Change Operational Control of the power plant to Mayacma Geothermal LLC was submitted on February 14, 2023, and staff approved on March 23, 2023. A Petition to Amend (PTA) to construct and operate a 7.5-megawatt (MW) binary geothermal power plant within the site was filed with the CEC in April 2023. Following discussion with CEC staff, Mayacma rescinded the PTA. In December 2024, Mayacma re-filed a PTA with the CEC to construct and operate a 7.5 MW binary geothermal power plant, reusing the water cooling towers. The PTA is currently under review.

COM-11 Reporting of Complaints, Notices and Citations

The project owner shall provide posted telephone number, and if not staffed twenty-four hours per day, must include automatic answering. The project owner must respond to all recorded complaints, and notify the CPM of any complaints, official notices, warnings, citations, court orders or fines. Copies of all relevant information must be included in the Annual Compliance Report.

The Bottle Rock Power, LLC facility ceased operations including wellfield steam production in March 2015. Since this time, the operator, now Mayacma has maintained a 24-hour accessible phone number that includes automatic answering/recording and is carried by the contracted caretaker. This number is clearly posted on access gate signage. All received calls/messages are forwarded to contracted project managers by the caretaker; and promptly addressed.

Mayacma acknowledges CPM notification of any complaints, official notices, warnings, court orders or fines. No complaints were received by Mayacma during the year of non-operational status in 2024, and no notification to the CPM was required.



COM-12 Emergency Response Site Contingency Plan

Prior to the start of commercial operation, the project owner must submit for CPM review and approval, an Emergency Response Site Contingency Plan.

An Emergency Response Site Contingency Plan had been previously submitted for CPM review prior to the original Bottle Rock Power, LLC start-up in 1983, and re-start-up in 2007.

COM-13 Incident Reporting Requirements

Within 12 hours the project owner must notify the CPM, by telephone and email, of any incident at the power plant that results or could result in emergency reporting to any federal, state, or local agency.

Mayacma acknowledges this condition. No incidents occurred during Mayacma's year of non-operational status in 2024 that required emergency reporting to any Federal, State, or local agency, or CPM notification.

COM-14 Non-Operation

If the facility ceases operation temporarily, either planned or unplanned, for longer than one week, but less than three months, the project owner must notify the CPM.

Bottle Rock Power, LLC provided notification to the CPM of their indefinite length, suspended operations, prior to the stoppage of power production and shutting-in the wellfield on March 31, 2015. The facility remained in non-operational status in 2024 along with informing the CPM of the intent on re-purposing and not decommissioning the project.

COM-15 Closure Planning

To ensure that a facility's closure and long-term maintenance do not pose a threat to public health and safety or to environmental quality, the project owner must coordinate with the Energy Commission to plan and prepare for eventual permanent closure.

A Closure Plan generated by Dames & Moore in 1996 for Bottle Rock Power, LLC is on file with the CEC. Additionally, decommissioning tasks and cost estimates were updated and submitted for CEC review in 2013.



MAYACMA GEOTHERMAL LLC

COM-16 Closure Financial Assurances

A. Financial Surety Mechanism: Surety Bond

The project owner must provide financial assurances to the Energy Commission, guaranteeing adequate and readily available funds to finance interim operation, and facility closure, as needed. The financial assurances shall be in the form of an irrevocable closure surety bond and standby trust fund. The standby trust fund shall have as its Beneficiary the California State Energy Resources Conservation and Development Commission. Alternatively, a trust account, letter of credit, restricted bank account or other mechanism may be used if the mechanism and its provisions, including the institution involved, are approved by the CPM as providing an equivalent level of financial assurance.

The required level of financial assurance was set at \$1,341,500 by CEC staff in December 2013, to be escalated 5% over 5-Years for contingency, as follows:

2014	\$1,341,500
2015	\$1,408,575
2016	\$1,475,650
2017	\$1,542,725
2018	\$1,609,800
2019–On	\$1,676,875 (no further contingency escalation required).

The level of financial assurance required for 2019 was not escalated further. In 2023, Mayacma instated a Letter of Credit (LOC) with the CEC, replacing the former LOC previously instituted by Bottle Rock Power; it remains in effect.

AQ 1-1

The project owner shall summarize in an annual compliance report any interactions with the LCAQMD. The project owner shall immediately inform the CEC CPM and APB in writing of any formal appeals filed with the LCAQMD.

Mayacma maintained their on-going working relationship with the LCAQMD throughout the year. Mayacma continued to comply with the conditions delineated on each Authority to Construct (ATC) or Permit to Operate (PTO). An Annual Throughput report was completed, and fees paid to renew the project's PTOs and ATCs for the 2024 year; and the Quarterly Air Quality Reports were submitted. Mayacma continues to participate with the GAMP program.



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

AQ 1-6

The project owner shall furnish proof of installation and maintenance of the meteorological station and submission of the data there from in a form acceptable to the LCAQMD. The submittals shall be noted in periodic compliance reports filed with the CEC CPM.

Mayacma operated and maintained an onsite meteorological station, and data was available to LCAQMD, as requested.

AQ 1-7

The project owner shall submit in the Annual Compliance Report a statement describing project owner's participation in GAMP.

During 2024, Mayacma attended GAMP quarterly meetings via representative. Payment to Northern Sonoma County Air Pollution Control District (NSCAPCD) for GAMP Cost Share was made in the amount of \$17,934 in response to invoice VI-22-02. Receipt for payment is included in Appendix 2.

AQ 1-8

The project owner shall submit in the Annual Compliance Report to the CEC CPM appropriate confirmation from the LCAQMD that all ATCs and PTOs are current and active under the Terms and Conditions of LCAQMD Rules and Regulations. The project owner shall also include in this report a statement identifying any complaints and actions of resolution for air quality for the Bottle Rock facility.

Mayacma complied with all Authority to Construct (ATC) and Permit to Operate (PTO) conditions, in accordance with LCAQMD rules and regulations. Annual throughput calculations and report were submitted to LCAQMD, and fees paid to renew the project's PTOs and ATCs for the 2024 year (Appendix 2). No nuisance odor complaints, or actions of resolution for air quality were received in 2024.

AQ AC21-5, AC22-4, AC24-6, AC25-6, AC26-6

The operator shall provide safe access for representatives of the District, ARB, or EPA to inspect, review records, or collect samples as approved by the APCO, from this facility. Should the plant be secured by locks or gates, the District shall be provided keys,



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

combinations, or other means to gain immediate access for purpose of testing or inspection.

The Bottle Rock Power, LLC geothermal power plant has been off-line since March 31, 2015. There are no longer any employees, and the building is no longer in active use. The facility doors, perimeter fencing, and access road gates are all locked and secured. A caretaker is contracted to periodically visit and inspect the grounds; or accompany any scheduled or requested agency site inspection. The cell number to reach the contracted caretaker is clearly posted on the facility access gates. Additionally, this phone number was provided to LCAQMD to provide communication with the Caretaker for site access to maintain the District's ambient air quality monitoring stations located on the project grounds.

CR4-5

Project owner shall ensure that the existing fence on the north side of site CA-LAK-609 is maintained. A statement verifying compliance shall be provided in each Annual Compliance Report filed with the CEC CPM.

Mayacma inspected the fence on the north side of site CA-LAK-609. There is continuous fencing around the Arch site and it remains in good condition.

BR 5-1f & 5-3h

Annually, the project owner shall inspect all previously disturbed areas for soil erosion impacts and shall take corrective action whenever necessary. The project owner shall submit to the CEC CPM in the Annual Compliance Report the results of the monitoring and an explanation that verifies compliance with this condition.

No earth moving activities were performed in 2024, but Mayacma recognizes that such activities are restricted to the dry months (April to October).

In 2024 Mayacma completed all drainage inspections, as required. Leaf litter and pine needles were cleared from storm water drains along Upper High Valley Road. Beyond that, all drains along the roads remained clear.



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

High Valley Road: Photos of roads appear as they did in 2019. Outside of the minor clearance work described above, no additional work was performed in 2024. BRP will continue monitoring for changes.



Photo 1: Lower re-seeded section of High Valley Road



Photo 2 Upper re-seeded section of High Valley Road:



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

West Coleman Road: Photos of roads appear as they in 2019. Drainage ditches, energy dispersers, culverts, inlets, outlets, and diversions were inspected, and the road surface was clear. No further work was indicated or performed for 2024.



Photo 3: Area around West Coleman Road

The Francisco Spoils Pile and Steam field yard sedimentation areas: Photos appear as they did in 2019. Area remains completely covered with growth; basin controls (inlets, outlets, diversions, weirs, spillways) were in good working order. No additional work was performed in 2024.



Photo 4: Area around Francisco Spoils



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

Re-Injection line: Photos of roads appear as they did in 2019. Additional anchoring supports installed in 2014 continued to prevent the line from expanding into the access road and stabilized the line on the roadway crossing Cow Creek. No additional work was performed in 2024.



Photo 5: Injection Line Area

BR 5-2

One year prior to power plant deactivation, the project owner shall include in the decommissioning plan a biological resources element identifying mitigation measures. The project owner shall submit the biological resources element of the decommissioning plan in consultation with CDFG of adequacy and acceptability.

The facility remained in non-operational status in 2024 and the intent is to re-purpose, not decommission, the project. However, Mayacma recognizes that one-year prior to closure of the project, Mayacma will include a biological resources element in the decommissioning plan.



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

BR 5-3a

The project owner shall include the results and a discussion of the year's required monitoring (visual inspections; soil/needle tissue boron analysis) in the Annual Compliance Report.

Mayacma continued monitoring vegetation in the project area in 2024. Needle and understory soil samples were collected and analyzed for boron concentration. Mayacma monitors the same trees each year, and locations are shown in Figure 1, Appendix 3. Analytical results are presented in Table 1, Appendix 3. Associated Laboratory reports are presented in Appendix 3.

Coleman Pad and surrounding area

There were no significant changes in tree health from 2019 to 2024, so photos of trees appear the same as they did in 2019. Since inter-pad access roads (asphalt and dirt) are not utilized as they were during operations, there are no emissions in the area to impact the adjacent vegetation. At the Coleman Pad and surrounding area, the trees in the area were in good health with new needle growth. Smaller trees in more sun-exposed slopes continue to exhibit some drought stress, indicated by reduced needle length and reduced needle density. The monitored trees (A-1 and A-2) both had bare bottoms (3/4 of trees), and the rest of the trees looked healthy with green pine needles. A-1 had a few brown needles peppered throughout, with normal lower canopy; shaded understory needle and branch shedding has continued A-1.



Photo 6: Tree A-1



Photo 7: Tree A-2



2024 CEC ANNUAL COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

West Coleman Road

There were no significant changes in tree health from 2019 to 2024, so photos of trees appear the same as they did in 2019. Since inter-pad access roads (asphalt and dirt) are not utilized as they were during operations, there are no emissions in the area to impact the adjacent vegetation. At the West Coleman Pad and surrounding area, the trees were in good health with new needle growth. Smaller trees in more sun-exposed slopes continue to exhibit drought stress, as indicated by reduced needle length and reduced needle density. The monitored trees varied in drought-related health. Trees designated as B-1 and B-2 are younger trees, showing some light needle browning at the tips of their needles. The tree designated as B-3 is a mature tree with no needle browning noted.



Photo 8: Tree B-1



Photo 9: Tree B-2

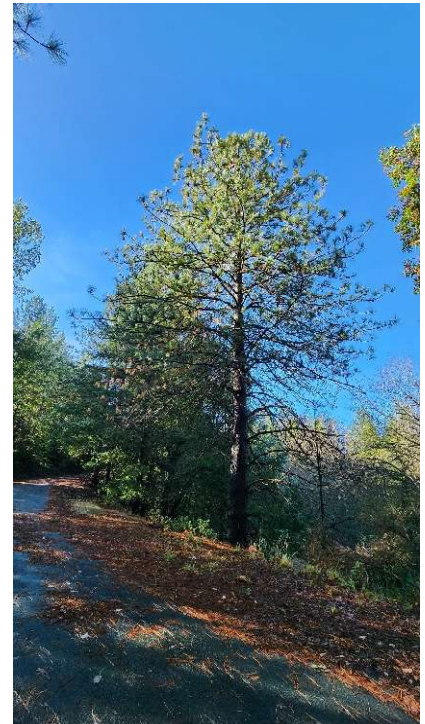


Photo 10: Tree B-3



2024 CEC ANNUAL COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

Access Road

There were no significant changes in tree health from 2019 to 2024, so photos of trees appear the same as they did in 2019. Since inter-pad access roads (asphalt and dirt) are not utilized as they were during operations, there are no emissions in the area to impact the adjacent vegetation. These are relatively young trees. No needle browning was noted. Both trees appear to have marginal vigor. Smaller trees in more sun-exposed slopes exhibit more drought stress, as indicated by reduced needle length and reduced needle density. Normal lower canopy, shaded understory needle and branch shedding has continued.

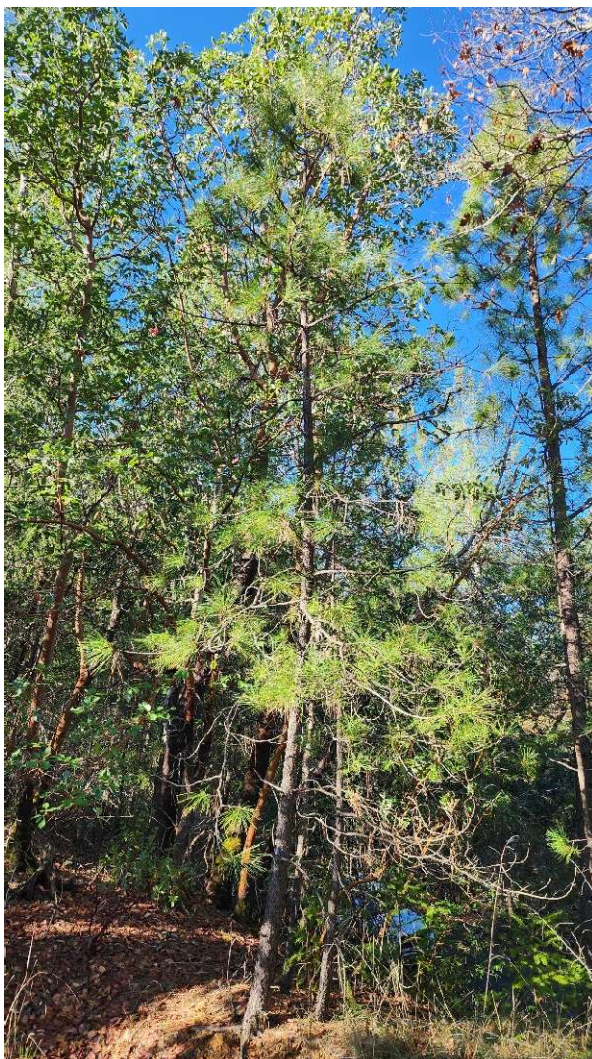


Photo 11: Tree C-1

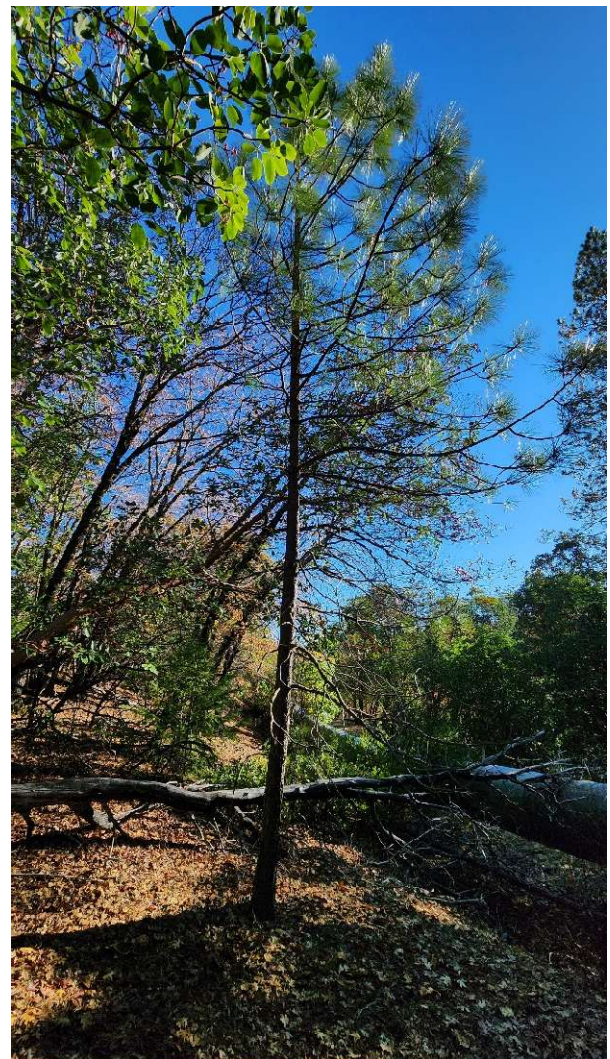


Photo 12: Tree C-2



2024 CEC ANNUAL COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

North of Plant fence line

There were no significant changes in tree health from 2019 to 2024, so photos of trees appear the same as they did in 2019. Since inter-pad access roads (asphalt and dirt) are not utilized as they were during operations, there are no emissions in the area to impact the adjacent vegetation. Near the main plant and surrounding area, the trees in the area are overall in good health. Smaller trees in more sun-exposed slopes exhibit drought stress, as indicated from reduced needle length, reduced needle density, and some needle tip burning. D-1 and D-2 on the uppermost slope with greatest sun exposure, are younger trees. No needle browning was noted. The tallest tree (D-3, > 10 meters) downslope on more shaded, level ground exhibited good new needle growth. Normal lower canopy, shaded understory needle and branch shedding has continued D-3. A photo was taken of adjacent tree to show healthy needle growth in this immediate area.



Photo 13: Tree D-1



Photo 14: Tree D-2



Photo 15: Tree D-3

BR 5-3b

The project owner shall include the results and a discussion of the year's required monitoring (surface water sampling and analysis) in the Annual Compliance Report.

Regional surface water quality was monitored through the quarterly sampling of the following locations: Kelsey Creek near Kelseyville (SW-6), Kelsey Creek above High Valley Road (SW-7), High Valley Creek above Kelsey Creek (SW-8), Adler Creek above Glenbrook (SW-9), and Kelsey Creek above Glenbrook (SW-10). Water monitoring locations are shown in Figure 2, Appendix 3.

Sampling procedures were consistent with EPA ground surface water sampling protocols. Data collected and analyzed include physical water quality parameters, selected major/minor element concentrations, dissolved metals concentrations and coliform bacteria. Samples were collected



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

in reagent prepared containers provided by analytical laboratories Analytical Sciences of Petaluma and Alpha Analytical Laboratories, also of Petaluma. These included two, one-liter Nalgene for cations and anions; two, 250 ml Nalgene for total coliform and turbidity; and a 100 ml glass vial for dissolved oxygen. Date and time were recorded with each sample collection. Samples were labeled in the field and placed in an ice chest for transportation to the laboratory along with the proper chain of custody documentation.

Surface water monitoring analytical results for 2024 are summarized in Table 2 in Appendix 3. Laboratory reports are presented in Appendix 3. Surface water sampling results are not available for SW-7 (Kelsey Creek above High Valley Road) during the 3rd quarter, as the sampling area was dry.

BR 5-3c

The project owner shall include the results and a discussion of the year's required monitoring (groundwater sampling and analysis) in the Annual Compliance Report.

Regional groundwater quality was monitored through the quarterly sampling of the following locations: Barrett Spring (GW-1) and Francisco Well (GW-3). Figure 1 shows all groundwater and surface water sampling locations. Sampling of Union Spring (GW-2) has not been conducted in many years due to unsafe access and large amounts of poison oak in the area. Access to Coleman Well (GW-4) and Wright Spring (GW-5) was not available in 2024 due to closed and posted gate. Additionally, sites GW-2 and GW-5 are located on leases managed by the Calpine Corporation and access is restricted.

Sampling procedures were consistent with EPA ground surface water sampling protocols. Data collected and analyzed include physical water quality parameters, selected major/minor element concentrations, dissolved metals concentrations and coliform bacteria. Samples were collected in reagent prepared containers provided by analytical laboratories Analytical Sciences of Petaluma and Alpha Analytical Laboratories, also of Petaluma. These included two, one-liter Nalgene for cations and anions; and one, 250 ml Nalgene for turbidity. Date and time were recorded with each sample collection. Samples were labeled in the field and placed in an ice chest for transportation to the laboratory along with the proper chain of custody documentation.

Groundwater monitoring analytical results for 2024 are summarized in Table 2 in Appendix 3. Laboratory reports are presented in Appendix 3.



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

BR 5-3d

The project owner shall include the results and a discussion of the year's required monitoring (biennial wildlife) in the Annual Compliance Report.

The guzzlers and nesting boxes installed as part of the original construction mitigation plan have been monitored since 1984. After nearly 50 years, the disturbance incurred during original construction has long since passed, and the wildlife prefer to utilize the natural environment rather than the man-made boxes and water sources. Therefore, in 2024, wildlife monitoring was not conducted. Mayacma still maintains the water trough behind WW-1 as a default source of water for wildlife.

BR 5-3i

The Annual Compliance Report will collate and summarize all monitoring results including methodologies used to satisfy conditions 5-3a – 5-3h.

Methodologies used to satisfy conditions 5-3a – 5-3d are detailed in each respective section of this Annual Report.

The monitoring results for Soil/Needle Tissue Boron analysis are shown in Table 1, Appendix 3.

The monitoring results for Surface Water analysis are shown in Table 3, Appendix 3.

The monitoring results for Groundwater analysis are shown in Table 3, Appendix 3.

BR 5-3j

The project owner in consultation with CEC CPM will take action to correct any specific mitigation measure or monitoring program is determined to be ineffective, or if the CEC CPM receives any submittal, complaints, or other information from the project owner, other agencies, or the public, that indicates one or more significant impacts are occurring on the leasehold subject to CEC jurisdiction.

Mayacma acknowledges this condition.

WR 6-1

Project owner shall, during any period of suspension, utilize no new surface water as the source for any maintenance or other necessary activity without first notifying and



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

obtaining the required authorization from the appropriate federal, state, county, or local agencies.

Mayacma acknowledges this condition. Mayacma maintains WW-1 and WW-2 for water supply to the Field Maintenance Shop and emergency water for the plant, should that be required, such as Injector de-pressurization.

WR 6-2

Project owner shall maintain on file the Spill Contingency and Containment Plan (SCCP) originally required by the CVRWQCB.

Mayacma maintains, and updates as needed their Spill Prevention Countermeasure Control Plan. A copy of this plan is available upon request.

WR 6-3

Project owner shall submit annually to the CVRWQCB and to the CEC CPM, via the Annual Compliance Report, a record of maintenance and corrective measures to the spill containment system.

There are five (5) storm water collection sumps located within the facility yard. These sumps flow into the cooling tower overflow pits, and gravity drain into the Coleman Pad injection well. Mayacma contractors conduct inspections during and after stormwater events to ensure the system is operating correctly. All pumps were serviced in 2021, including periodic use of portable electric sump pumps and cleaning of injection well and cooling tower filter screens.

WR 6-4

Project owner shall submit annually to the CVRWQCB and to the CEC CPM, via the Annual Compliance Report, a record of maintenance and corrective measures to the wastewater disposal system.

In 2024, the facility was not operating. Consequently, the domestic water waste disposal system did not receive much use or require any maintenance.

WR 6-5

Project owner shall maintain quarterly records of the volume of water pumped from the on-site supply well.

Mayacma maintained records in 2024 of monthly water pumping from industrial wells #1 and #2. Mayacma also maintains a running tally of water injected into the injection well.



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

WR 6-6

Project owner shall submit annually to the CEC CPM a record of maintenance and operation of the drainage sump pump discharge to the injection wells(s).

There are five (5) storm water collection sumps located within the facility yard. These sumps flow into the cooling tower overflow pits, and gravity drain into the Coleman Pad injection well. Mayacma contractors conduct inspections during and after stormwater events to ensure the system is operating correctly.

S 8-4

At least six months prior to scheduled decommissioning, the project owner shall submit site restoration plans to the CEC CPM for review and approval.

The facility remained in non-operational status in 2024 and Mayacma is actively working on re-purposing, not decommissioning the project. However, Mayacma recognizes that six months prior to scheduled decommissioning, Mayacma will submit site restoration plans to the CEC CPM.

CE 9-5

At least six months prior to scheduled decommissioning, the project owner shall submit its site reclamation plan to the CEC CPM for review and approval.

The facility remained in non-operational status in 2024. Mayacma's intent is to repurpose, not decommission the project. However, Mayacma recognizes that six months prior to scheduled decommissioning, Mayacma will submit site reclamation plan to the CEC CPM.

SWM 11-7

The project owner shall notify the CEC CPM in writing within 10 days of becoming aware of an impending (waste management -related) enforcement action.

Mayacma acknowledges this condition.



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

SWM 11-8

The project shall include the results of sludge testing in a report provided to the CEC CPM.

In 2024, the facility was not operating. Consequently, the cooling tower was not in use for heat rejection from power generation or condensation of produced steam. The cooling tower was cleaned in 2015, but no sludge removal and disposal were performed in 2024. Mayacma keeps a minimum level in the cooling tower to mitigate exposing the cooling tower basin floor and allowing drying and maintain dust control.

S 12-8

Project owner shall notify the CEC CPM of any changes to the approved accident prevention program and provide verification of California Occupational Safety and Health Administration (Cal/OSHA) approval of said changes.

Mayacma acknowledges this condition.

S 12-9

During any suspension, the project owner shall notify the CEC CPM in writing in the event of a violation that could involve DOSHA action, and the necessary corrective action.

Mayacma acknowledges this condition.

S 12-10

Within 90 days of suspending operations, the project owner shall submit the following to the CEC CPM: (1) a list of all hazardous chemicals and the quantities that are to remain on site during any suspension, and (2) the signature of the responsible Plant Manger certifying compliance with this condition.

No changes have been made to the Hazardous Materials Inventory list since it was updated and filed with Lake County CUPA in 2021.

TS&N 13-2

The project owner shall also inspect the transmission line annually to ensure that the line maintains required clearances especially during the fire season. In the event that



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT

MAYACMA GEOTHERMAL LLC

noncompliance is determined by the CDF, the CDF shall require the project owner to take measures necessary to correct the noncompliance.

The Transmission Line (T-Line) corridor tower and vegetation maintenance is the responsibility of PG&E and their designated contractors. PG&E, over the last several years, has engaged in extensive vegetation management on the 230kV line as well as the 12kV distribution line that supplies power to the well pads. The line continues thru the project to supply private residences in the valley.

During 2024, PG&E continued to conduct clearing of the T-Line, assess growth, and engage in supplemental trimming.

N 16-1

Project owner shall comply with Lake County's noise ordinance, which is 55 dBA Ld. and 45 dBA Ln at any point beyond the property line of the source.

The facility was not operating in 2024. No noise complaints were received in 2024.



Appendix 1

Interim Conditions of Compliance

Compliance Matrix

***Annual Energy Facility Compliance Fee – Proof of
Payment***



2024 CEC INTERIM CONDITIONS OF COMPLIANCE REPORT
MAYACMA GEOTHERMAL LLC

Appendix 2

***Current Year LCAQMD Authorities to Construct and
Permits to Operate***

GAMP Participation – Proof of Payment



Appendix 3

Figure 1 - Vegetation Monitoring Map

Table 1 – Vegetation & Soil Boron Analytical Results

Vegetation & Soil Boron Analytical Reports

Figure 2 – Water Monitoring Map

Table 2 – Groundwater & Surface Water Analytical Results

Groundwater & Surface Water Analytical Reports