

## DOCKETED

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*Comment Received From: Jay Hepper*

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**Enough is Enough, a rebuttal and reality toward the negativity directed at Bottle Rock Power**

*Additional submitted attachment is included below.*

California Energy Commission  
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My name is Jay Hepper. I started my geothermal career at the Geysers over 35 years ago. I have seen and done a lot in that time. I believe I have worked around several thousand individuals with varying levels of Geysers experience at the Geysers. I have worked in all the Geysers areas, except the NCPA area. I have also been to other parts of the country at other geothermal operations.

Find my response below in regards to the CEC public hearing negative comments that were made toward Bottle Rock Power in Cobb, California on 11/18/2013:

I believe that we have all been subjected to a handful of dissident NIMBY residents going out of their way to hurt Bottle Rock Power (BRP) financially, publically, in any way they can and what they claim regarding this business is less than truthful, baseless and unsubstantiated. Part of the reason you may not have opposition to their comments lies in their past behavior of verbal and physical threats and heckling of others who have spoken on BRP's behalf. I've about had it with the level of biased mockery and shenanigans.

In my 35 years of experience, neither I, or any of the other individuals I have worked with at the Geysers have ever had a nose bleed or caught cancer or any other of the maladies claimed to you from hydrogen (H<sub>2</sub>S) at the Geysers. H<sub>2</sub>S occurs naturally in this region. BRP's emissions are less than 5% of the emissions generated hill wide and many times BRP is unfairly blamed for all emissions detected. Remember, you are talking about a work location on an old volcano, in a volcanic region, still seismically active, that still produces naturally occurring emissions of its own. Ever imagine the possibility of H<sub>2</sub>S at a volcano? Any other volcano, anywhere? Interesting food for thought. Note also that BRP's much larger industrial neighbor Calpine (CPN) has BRP virtually surrounded on 3 sides by Condensate Collection Pump stations (CPS). These surrounding 'CPS's' from East all the way around to NW are: 1) Alder Creek CPS, 2) Negu 7A CPS, 3) Negu 1 CPS, 4) Negu-15 CPS, 5) Horner CPS, 6) DX-23 CPS, 7) DX-45 CPS, 8) Ca. ST 92-6 CPS. There are more a little farther out and there is of course old PGE unit 17 geothermal plant above BRP's West Coleman pad with emissions limits of 10 pounds per hour and Unit 11 which has an of 88 pounds per hour of H<sub>2</sub>S emissions limit. None of these named CPS's has any mitigation of any type with the exception of Alder Creek which has some garden soil piled atop of it. All three (3) of BRP's CPS's are mitigated, abated and checked at least twice every shift, sometimes multiple times per shift. It is also common practice at CPN during startup, shut downs, freeze protection modes and various other steam shifting operations to flow unabated steam into these CPS's, regardless of drift. It is my assertion, that this is another example of how BRP is unfairly blamed for suspected H<sub>2</sub>S emissions. Additionally, when CPN shuts in their surrounding steam or production wells, they often put them on an atmospheric bleed, sometimes a ¼" valve to atmosphere, sometimes to an 'Aspirator' which also bleeds steam to atmosphere. None the less, the CPS bleed steam often drifts over BRP and the neighboring area in another example of how BRP could be unfairly blamed for an occurrence that is not of their doing. All of these stations and plants can be viewed on line by anyone having access to Google Earth or any other similar type program.

In regard to comments that BRP has only a staff of 2 on the off shift hours, keep in mind that CPN during the same periods of time have anywhere from one (1) person to no one at all in their plants. Plants have tripped off line on upset conditions until staff could arrive, resulting in emissions that could be unfairly blamed on BRP.

Even when CPN's plants and fields are in compliance, BRP could be unfairly blamed by someone else's drift because in Sonoma County they are allowed much higher emissions limits with their Title V permits, in many cases 18 times more emissions are allowed. CPN has 3 drilling rigs in the vicinity and have been drilling significantly over the last several years. Their operations, because they are just across the county line, are not obligated to report or divulge the nature of their operations. Another means of mistaken blame to BRP, blame in the shadow of BRP's larger industrial neighbor.

Regarding Ms. Fung's comments about fracturing: Remember, geothermal fracturing procedures are not the same as oil and gas. Look up the procedures or contact the Geysers Geothermal Association for an explanation. She also falsely accuses BRP of filling High Valley Creek with poison. That is absurd. Check with the local and state agencies. BRP does quarterly water sampling and storm water sampling and have never found poison in the creeks. She also made less than truthful comments about BRP's production steam being worthless and nobody wanting it. BRP has a twenty year power purchase agreement so obviously there is a customer for this power. She made mention of 'Calpine says' this and 'Calpine says' that, in her comments to you at your last meeting. I believe she is either being intentionally misinformed, is confused, mixed up her information in some way, or for some other reason is giving you misinformation.

Regarding Mr. Stark's comments about the BRP plant being 'anything but reliable'. He is mistaken or misinformed, or attempting to misinform the CEC. BRP's on line 96% reliability and availability record speaks for itself. That information is accessible to the CEC.

Regarding Mr. Hess's statements about the expansion area being explored without much success. He is also mistaken. The exploratory results are available through California Department of Oil, Gas, and Geothermal Resources (CDOGGR). There is a very large pursuable resource there, including the neighboring 'Prati' or 'Caldwell Ranch' leasehold, so much so that both Calpine and BRP entered into a bidding war that resulted in the highest prices ever paid for development rights for that leasehold. Look it up. The CEC has the means.

Regarding Ms. Matzinger's comments about BRP constantly breaking our hearts and promises since they started is simply not true. The current management team under Brian Harms is absolutely above board, compliant with the law, and regularly gives monetary donations, land, home owner and other types of support and assistance to the surrounding community. Recently, BRP staff installed new culvert drainage for our residents on company time along High Valley Road. BRP regularly gives money and assistance to the local schools and county fair including FFA & 4H support. At least one of the school teachers who asks for and takes money from BRP was present with the Friends of Cobb Group. So, what's up with that? Two faced? A double standard? Take from anybody? What audacity. Go figure.

Regarding Mr. Gail Weiss's comments about antiquated abatement system instrumentation are absurd. I believe he doesn't know what he's talking about. And giving mean threatening looks won't change that. Wrong is still wrong. BRP's instrumentation is up to date and complies with all regulations. Check with your local air quality management officials or BRP staff. Lead Acetate Tape technology is the best available technology for gather H2S data.

Regarding 'Squatty's' (The land owner who squat's on his sisters property. Mr. Fidge. She is terrified of him due to his unstable nature and that is why he still lives on her land rent free) comments about not having proper H2S monitors. Again, misinformed or confused. Check with BRP staff or Lake County Air Quality Management District. That information will speak for itself.

Regarding Joan Moss's comments about cleaning up the rivers, the dirt and get a sun or wind plant in there?? The rivers and dirt? Interesting. The project site is likely not a sustainable site for a wind or solar plant unless added to the geothermal project as a supplement and profit margins for something like that would be questionable at best. Look up the statistics. CEC has the means to investigate a prove that out. Pink rotten bad steam too? Really? This woman is clearly out of touch with reality. It is a very clean running desirable steam field that BRP's neighbor would like to take over. Hauling geothermal waste to regular dump sites? Again, really? A baseless un-provable accusation. Any waste leaving the project site is regularly inspected.

Regarding Mr. Fidge's comments about reports of pink steam in at the lesperance –Calpine's- lease. That was purported to be traces of iron oxide. LCAQMD records again are accessible to CEC. Also, regarding the poisonous nature of the 'vile' pink steam.....really?? Has anyone ever encountered a phenomenon called 'rust' in their lifetime? Is anyone you know still alive from looking at or touching something rusty? A reality check is needed here. Regarding BRP's putting rocks in the road: that was over something called 'trespassing'. Not only that, but excessive and unsafe speeding. Sometimes, upwards of 55 mph on a back woods dirt road and this is verifiable because the County of Lake has video of him doing this where BRP's workers could be present. In my opinion, the CEC needs to beware of Mr. Fidge. At least on the backwoods dirt roads, it might be a good idea to have one's insurance up to date.

Regarding Ms. Finn's nose bleed comments, I would refer you to my 1<sup>st</sup> couple of paragraphs about wrongful or misperceived odor blame onto BRP and also no conclusive proof of a connection between nose bleeds or any other related malady. None! Mrs. Finn who by the way is Kelly Fletchers wife has been a fire fighter all her life. I think if you looked up problems caused by long term exposure to smoke you may find regular nose bleeds would be on the list. Interesting that the odor was too much for them but they left their son to live in the High Valley house to be subjected. Also, she is mistaken in the assertion that BRP staff doesn't care about what they do. She is mistaken in any provable connection between the 3 and 4' deep pools that used to be in a seasonal creek being more than weather related. The pools still continue occur in the winter after a rain. Its winter and the rains have begun. With BRP's permission, your staff might be welcome to come to observe actual pools of creek water that somehow continue the anomaly of manifesting themselves during winter rains. She is also mistaken in her claim that BRP is unique in that all other plants at the Geysers attempt to address community concerns. BRP's contributions are of public record. Bottle Rock believes in accountability of their impact and to try to

mitigate it. The main contributor on the hill believes in buying people fancy signs and building them snack bars and pushing blame for their impact on other things than themselves rather than just mitigating their impact. Eventually the people will see through that. BRP is outspent by their larger industrial neighbor, who also happens to have contributed large amounts to the Anderson Springs group, aligned with the Friends of Cobb, Mr. Coleman, and by extension he attorney representing him at your meeting, and the hostile individuals commenting to the CEC which begs the question, is there a concerted and maligned collusion going on between the complainants? Is an unsuspecting group of CEC officials going to take at face value any of the spew put forth and make a judgment call that could potentially put BRP out of business, reduce the county's employment rolls, tax and royalty revenue, and destroy a legitimate green power source? For your staff member who couldn't remember what unit he helped to decommission, it was 15, not 16 and I was there too. PGE's #15 plant and equipment was snapped up by New Zealand-a country that encourages and supports geothermal companies and their operations. They do not go out of their way to try to regulate their energy sources out of business. Some of my information sources are industry colleagues who have worked in geothermal over there. Unit #16, I have worked at too. It is still running and located across the geysers below PGE#13 and across from the NCPA plants. Interesting the guy who helped take it apart didn't remember where it was or even the right plant number. I remember-it was a job, a career, a livelihood and a means of support for my family to me. Like the unwarranted attacks on BRP now, how could I forget? Plant Reclamation decommissions places for a living and his value and costs are correct.

In closing, even if the individuals who spoke to you and your committee the less than truth's I believe I heard at your last meeting, would it make any difference either way in the CEC's findings to want to continue to pursue attempting to require BRP to have and hold a bond based on a 55MW nameplate rating issued some 3 decades ago? No Geysers Geothermal plant even makes its nameplate rating anymore to the best of my knowledge. No other plant in the state, save one solar plant has to provide a bond of such a nature. Even that plant's bond amount is tiny by comparison. Why single out BRP and put such a requirement on it that you might appear to be attempting to 'regulate' it out of business. I do not agree with CEC's staff insisting on a bond for such a huge sum. Please help to protect and support this state's geothermal and other green power as other countries do. Please help and protect and support this state's geothermal and other green power. Even Nevada does that.

Thank you for hearing my opinion. Enough is enough!